

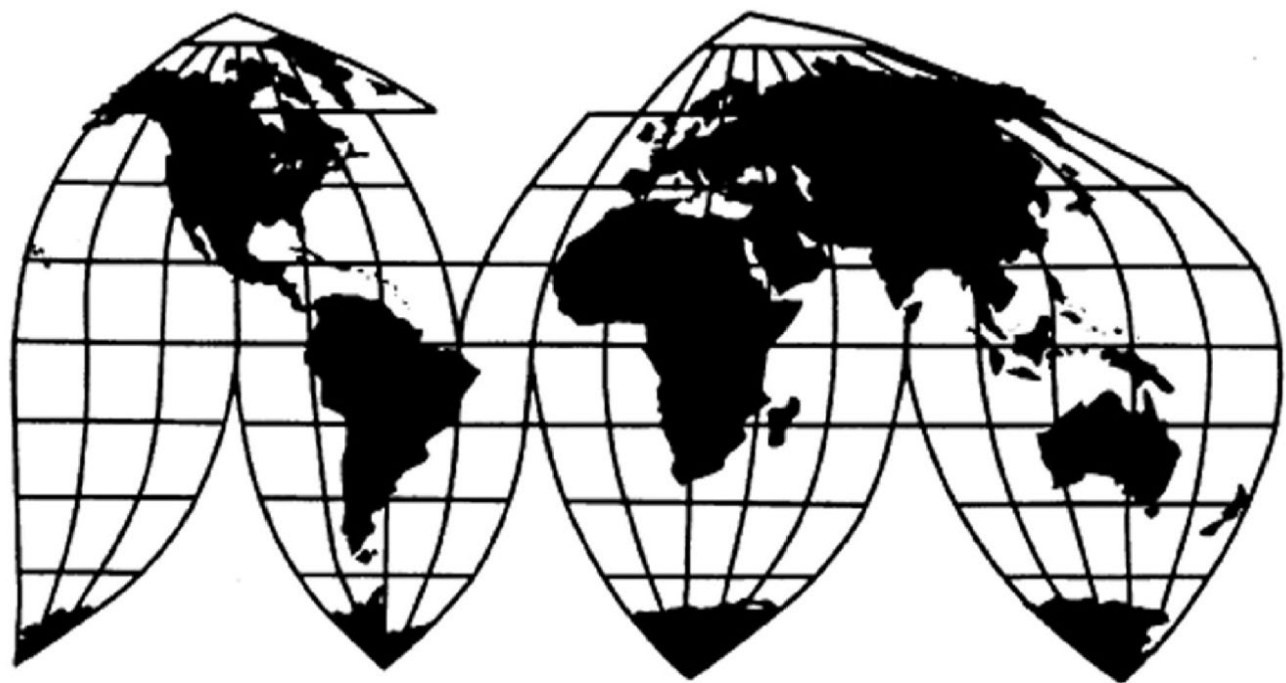
Truck and Bus Tires from Thailand

Investigation No. 731-TA-1658 (Final)

Publication 5562

December 2024

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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CONTENTS

	Page
Determination	1
Views of the Commission	3
Part I: Introduction	I-1
Background.....	I-1
Statutory criteria	I-2
Organization of report.....	I-3
Market summary.....	I-3
Summary data and data sources.....	I-4
Previous and related investigations.....	I-4
Nature and extent of alleged sales at LTFV.....	I-6
The subject merchandise	I-7
Commerce’s scope	I-7
Tariff treatment.....	I-8
The product.....	I-9
Description and applications.....	I-9
Manufacturing processes	I-15
Domestic like product issues.....	I-22

CONTENTS

	Page
Part II: Conditions of competition in the U.S. market.....	II-1
U.S. market characteristics.....	II-1
COVID-19 pandemic	II-2
U.S. purchasers.....	II-3
Impact of section 301 tariffs	II-4
Channels of distribution	II-4
Geographic distribution	II-5
Supply and demand considerations	II-5
U.S. supply	II-5
U.S. demand	II-9
Substitutability issues.....	II-13
Factors affecting purchasing decisions.....	II-15
Purchase factor comparisons of domestic products, subject imports, and nonsubject imports	II-21
Comparison of U.S.-produced and imported truck and bus tires	II-33
Elasticity estimates.....	II-36
U.S. supply elasticity.....	II-36
U.S. demand elasticity	II-36
Substitution elasticity	II-37

CONTENTS

	Page
Part III: U.S. producers' production, shipments, and employment	III-1
U.S. producers	III-1
U.S. production, capacity, and capacity utilization	III-7
Alternative products	III-13
U.S. producers' U.S. shipments and exports	III-14
U.S. producers' inventories	III-18
U.S. producers' imports from Thailand	III-19
U.S. producers' purchases of imports from Thailand	III-21
U.S. employment, wages, and productivity	III-21
Part IV: U.S. imports, apparent U.S. consumption, and market shares	IV-1
U.S. importers	IV-1
U.S. imports	IV-4
Negligibility	IV-9
Critical circumstances	IV-10
Apparent U.S. consumption and market shares	IV-13
Quantity	IV-13
Value	IV-16
U.S. shipments to OEMs and the aftermarket	IV-18

CONTENTS

	Page
Part V: Pricing data	V-1
Factors affecting prices	V-1
Raw material costs	V-1
Transportation costs to the U.S. market.....	V-3
U.S. inland transportation costs	V-3
Pricing practices	V-3
Pricing methods.....	V-3
Sales terms and discounts	V-5
Price leadership	V-5
Price data.....	V-6
Price trends.....	V-19
Price comparisons	V-20
Lost sales and lost revenue	V-21
Part VI: Financial experience of U.S. producers	VI-1
Background.....	VI-1
Operations on truck and bus tires.....	VI-2
Net sales	VI-13
Cost of goods sold and gross profit or loss.....	VI-13
SG&A expenses and operating income or loss.....	VI-15
All other expenses and net income or loss	VI-17
Variance analysis	VI-18
Capital expenditures and research and development expenses	VI-19
Assets and return on assets	VI-21
Capital and investment	VI-23

CONTENTS

	Page
Part VII: Threat considerations and information on nonsubject countries	VII-1
The industry in Thailand.....	VII-3
Changes in operations.....	VII-5
Operations on truck and bus tires.....	VII-5
Alternative products.....	VII-9
Exports.....	VII-10
U.S. inventories of imported merchandise.....	VII-13
U.S. importers' outstanding orders.....	VII-16
Third-country trade actions.....	VII-16
Information on nonsubject countries.....	VII-17
Appendixes	
A. Federal Register notices.....	A-1
B. List of hearing witnesses.....	B-1
C. Summary data.....	C-1
D. Individual firm responses on tiers.....	D-1
E. U.S. shipments of truck and bus tires by channel, branding, source, and period.....	E-1
F. Nonsubject country price data.....	F-1

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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1658 (Final)

Truck and Bus Tires from Thailand

DETERMINATION

On the basis of the record¹ developed in the subject investigation, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of truck and bus tires from Thailand, provided for in subheadings 4011.20.10 and 4011.20.50 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”).^{2 3}

BACKGROUND

The Commission instituted this investigation effective October 17, 2024, following receipt of a petition filed with the Commission and Commerce by the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC, Pittsburgh, Pennsylvania. The Commission scheduled the final phase of the investigation following notification of a preliminary determination by Commerce that imports of truck and bus tires from Thailand were being sold at LTFV within the meaning of § 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigation and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of June 12, 2024 (89 FR 49903). The Commission conducted its hearing on October 15, 2024. All persons who requested the opportunity were permitted to participate.

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

² 89 FR 83636 (October 17, 2024).

³ The Commission also finds that imports subject to Commerce's affirmative critical circumstances determination are not likely to undermine seriously the remedial effect of the antidumping duty order on China.

Views of the Commission

Based on the record in the final phase of this investigation, we determine that an industry in the United States is materially injured by reason of imports of truck and bus tires (“TBTs”) from Thailand found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”). We also find that critical circumstances do not exist with respect to imports of TBTs from Thailand that are subject to Commerce’s final affirmative critical circumstances determination.

I. Background

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC (“USW” or “Petitioner”), which represents workers engaged in the production of TBTs, filed the petition in this investigation on October 17, 2023. Petitioner submitted prehearing and posthearing briefs, and final comments, and representatives for Petitioner submitted testimony and appeared at the hearing accompanied by counsel.¹

No respondents participated in the final phase of this investigation.²

U.S. industry data are based on the questionnaire responses of seven U.S. producers, which accounted for virtually all known U.S. production of TBTs in 2023.³ U.S. import data are based on official Commerce import statistics and questionnaire responses from 32 U.S. importers, representing 67.6 percent of U.S. imports of TBTs from Thailand and 66.5 percent of

¹ Bridgestone Americas Inc. also filed final comments, limited to opposing a finding of critical circumstances, as discussed below.

² In contrast, in the preliminary phase of this investigation, two respondent entities actively participated. Prinx Chengshan Tire (Thailand) Co., Ltd., a producer and exporter of subject merchandise from Thailand, and Prinx Chengshan Tire North America, a U.S. importer of subject merchandise from Thailand, appeared at the staff conference represented by counsel and submitted a joint postconference brief. American Omni Trade Company, LLC, a U.S. importer of subject merchandise from Thailand, submitted a postconference brief. *See Truck and Bus Tires from Thailand*, Inv. No. 731-TA-1658 (Preliminary), USITC Pub. 5478 (Dec. 2023) (“Preliminary Determination”) at 3-4.

³ CR/PR at I-4 & III-1. The seven U.S. producers are Bridgestone Americas Tire Operations, LLC (“Bridgestone”), Continental Tire the Americas, LLC (“Continental”), The Goodyear Tire & Rubber Company (“Goodyear”), Michelin North America, Inc. (“Michelin”), Specialty Tires of America, Inc. (“Specialty”), Sumitomo Rubber USA, LLC (“Sumitomo”) and Yokohama Tire Manufacturing Mississippi (“Yokohama”). CR/PR at Table III-1.

U.S. imports from nonsubject sources in 2023.⁴ Foreign industry data are based on questionnaire responses from six Thai producers of subject merchandise, accounting for *** percent of production of TBTs in Thailand and *** percent of exports of TBTs from Thailand to the United States in 2023.⁵

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”⁶ Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”⁷ In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”⁸

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.⁹ Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”¹⁰ The Commission then defines the domestic like product

⁴ CR/PR at I-4 & IV-1. U.S. imports of TBTs are based on official import statistics under HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020. CR/PR at I-4 & IV-1.

⁵ CR/PR at VII-3.

⁶ 19 U.S.C. § 1677(4)(A).

⁷ 19 U.S.C. § 1677(4)(A).

⁸ 19 U.S.C. § 1677(10).

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

¹⁰ *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

in light of the imported articles Commerce has identified.¹¹ The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.¹² No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹³ The Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁴

B. Product Description

Commerce has defined the imported merchandise within the scope of this investigation as follows:

. . . Truck and bus tires are new pneumatic tires, of rubber, with a truck or bus size designation. Truck and bus tires covered by the scope may be tube-type, tubeless, radial, or non-radial (also known as bias construction or bias-ply). Subject tires have, at the time of importation, the symbol “DOT” on the sidewall, certifying that the tire conforms to applicable motor vehicle safety standards.

¹¹ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

¹² *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); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹³ *See, e.g., S. Rep. No. 96-249 at 90-91 (1979).*

¹⁴ *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; *see also S. Rep. No. 96-249 at 90-91* (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

Subject tires may also have one of the following suffixes in their tire size designation, which also appear on the sidewall of the tire:

TR—Identifies tires for service on trucks or buses to differentiate them from similarly sized passenger car and light truck tires; and

HC—Identifies a 17.5 inch rim diameter code for use on low platform trailers.

All tires with a “TR” or “HC” suffix in their size designations are covered by the scope regardless of their intended use.

In addition, all tires that lack one of the above suffix markings are included in the scope, as well as all tires that include any other prefix or suffix in their sidewall markings, are included in the scope, regardless of their intended use, as long as the tire is of a size that fits trucks or busses. Sizes that fit trucks and busses include, but are not limited to, the numerical size designations listed in the “Truck-Bus” section of the Tire and Rim Association Year Book, as updated annually. The scope includes all tires that are of a size that fits trucks or busses, unless the tire falls within one of the specific exclusions set out below.

Truck and bus tires, whether or not mounted on wheels or rims, are included in the scope. However, if a subject tire is imported mounted on a wheel or rim, only the tire is covered by the scope. Subject merchandise includes truck and bus tires produced in the subject country whether mounted on wheels or rims in the subject country or in a third country. Truck and bus tires are covered whether or not they are accompanied by other parts, e.g., a wheel, rim, axle parts, bolts, nuts, etc. Truck and bus tires that enter attached to a vehicle are not covered by the scope.

Specifically excluded from the scope are the following types of tires: (1) pneumatic tires, of rubber, that are not new, including recycled and retreaded tires; (2) non-pneumatic tires, such as solid rubber tires; and (3) tires that exhibit each of the following physical characteristics: (a) the

designation “MH” is molded into the tire’s sidewall as part of the size designation; (b) the tire incorporates a warning, prominently molded on the sidewall, that the tire is for “Mobile Home Use Only;” and (c) the tire is of bias construction (also known as non-radial construction) as evidenced by the fact that the construction code included in the size designation molded into the tire’s sidewall is not the letter “R.”¹⁵

The scope is unchanged from the preliminary phase of this investigation.¹⁶

TBTs covered by the scope of the investigation are new pneumatic tires of rubber certified by the U.S. Department of Transportation (“DOT”) for on-road or highway use.¹⁷ They are used on a wide range of types and sizes of vehicles designed to transport heavy cargo and passengers on roads and highways.¹⁸ They are designed to be mounted on heavier commercial vehicles compared to the lighter on road tires found on consumer passenger vehicles and commercial light trucks.¹⁹ They also support the higher load bearing requirements of heavier commercial vehicle platforms, and are generally heavier, stronger, and larger.²⁰ TBTs are produced in a large variety of types and sizes found on a wide range of commercial vehicles, from local delivery and municipal service trucks and buses in urban/regional settings, for example, to the large 18-wheel tractor-trailer rigs and passenger buses found in long-haul higher speed use on U.S. highways and interstate systems.²¹ TBTs, whether used by original equipment manufacturers (“OEMs”)²² for new vehicles or used by consumers as replacements on used vehicles for the aftermarket, are each subject to the same motor vehicle standards for safety and sidewall marking.²³

¹⁵ *Truck and Bus Tires from Thailand: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances, In Part*, 89 Fed. Reg. 83636, 83638-83639 (Oct. 17, 2024).

¹⁶ *Preliminary Determination*, USITC Pub. 5478 at 6-7.

¹⁷ CR/PR at I-9.

¹⁸ CR/PR at I-9.

¹⁹ CR/PR at I-9.

²⁰ CR/PR at I-9.

²¹ CR/PR at I-9.

²² OEMs for purposes of TBTs are manufacturers of buses and medium- and heavy-duty trucks. *See, e.g.*, CR/PR at I-10-11.

²³ CR/PR at I-10-11.

C. Arguments

Petitioner argues that the Commission should define a single domestic like product coextensive with the scope of the investigation, as it did in the preliminary phase of the investigation.²⁴ It contends that the Commission's traditional like product factors continue to support the finding of a single domestic like product.²⁵ It also points out that the scope of the investigation matches the scope in the previous investigations concerning TBTs from China in which the Commission defined a single domestic like product coextensive with Commerce's scope.²⁶

D. Analysis

In its preliminary determination, the Commission defined a single domestic like product consisting of all TBTs, coextensive with Commerce's scope.²⁷ The Commission found that all domestically-produced TBTs within the scope were produced using the same basic raw materials, had the same basic components, had the same end uses, and were produced through the same production processes at the same facilities using the same employees.²⁸ It also found that all domestically produced TBTs within the scope were sold through the same channels of distribution and were perceived to be a single product category by market participants.²⁹ While the Commission found that variations in the size and design of TBTs can limit their interchangeability with respect to specific trucks and buses, and corresponded to a wide range of prices, it also found that these differences were consistent with products existing on a continuum and did not establish clear dividing lines between truck and bus tire products.³⁰

The record of the final phase of this investigation does not contain any new information or argument concerning the characteristics and uses of TBTs suggesting that the Commission should revisit its definition of the domestic like product from the preliminary determination.³¹ Accordingly, we again define a single domestic like product consisting of all TBTs, coextensive with the scope.

²⁴ Petitioner's Prehearing Br. at 3.

²⁵ Petitioner's Prehearing Br. at 3.

²⁶ Petitioner's Prehearing Br. at 3.

²⁷ *Preliminary Determination*, USITC Pub. 5478 at 8-10.

²⁸ *Preliminary Determination*, USITC Pub. 5478 at 8-9.

²⁹ *Preliminary Determination*, USITC Pub. 5478 at 9.

³⁰ *Preliminary Determination*, USITC Pub. 5478 at 9.

³¹ See generally CR/PR at I-9-21.

III. Domestic Industry

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”³² 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.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.³³ Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.³⁴

In its preliminary determination, the Commission found that four firms (***) qualified for possible exclusion under the related parties provision, but that appropriate circumstances did not exist to exclude any of them from the domestic industry since their ratios of imports to domestic production were small and their primary interest lied in domestic production.³⁵

³² 19 U.S.C. § 1677(4)(A).

³³ See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int’l Trade 1992), *aff’d without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int’l Trade 1989), *aff’d mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int’l Trade 1987).

³⁴ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int’l. Trade 2015), *aff’d*, 879 F.3d 1377 (Fed. Cir. 2018); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

³⁵ USITC Pub. 5478 at 10-14.

Accordingly, the Commission defined the U.S. industry to encompass all domestic producers of TBTs.³⁶

In the final phase of this investigation, the same four domestic producers – *** – qualify for possible exclusion under the related parties provision because they imported subject merchandise during the POI.³⁷ Bridgestone and Yokohama also qualify as related parties through their affiliations with subject producers and exporters and, in Yokohama’s case, two U.S. importers of subject merchandise. Specifically, Bridgestone is affiliated with a subject producer and exporter in Thailand, Bridgestone Tire Manufacturing (Thailand) Co., Ltd., by way of a common parent company, Bridgestone Corporation.³⁸ Yokohama is affiliated with U.S. importers, Yokohama Tire and Yokohama Off-Highway Tires America, Inc., and Thai producer and exporter, Yokohama Tire Manufacturing (Thailand) Co., Ltd., through a common parent company, The Yokohama Rubber Co., Ltd.³⁹ Petitioner maintains that appropriate circumstances do not exist to exclude any domestic producers from the domestic industry pursuant to the related parties provision.⁴⁰

We discuss below whether appropriate circumstances exist to exclude any of these producers from the domestic industry.

. *** was the largest domestic producer of TBTs in 2023, accounting for *** percent of U.S. production that year.⁴¹ *** the petition.⁴² *** imports of subject merchandise were *** tires in 2021, *** tires in 2022, and *** tires in 2023; they were *** tires in January-June 2023 (“interim 2023”), compared to *** tires in January-June 2024 (“interim 2024”).⁴³ As a ratio to its U.S. production, *** subject imports were *** percent in 2021, *** percent in 2022, and *** percent in 2023; its ratio of subject imports to domestic production was *** percent in interim 2023, compared to *** percent in interim 2024.⁴⁴ *** reported importing subject merchandise during the POI in order to ***.⁴⁵ *** made significant capital expenditures for its domestic production operations during the POI, including \$ in 2021, \$*** in 2022, \$*** in

³⁶ USITC Pub. 5478 at 14.

³⁷ CR/PR at Tables III-15-18.

³⁸ CR/PR at Table III-2 & Bridgestone U.S. Producers’ Questionnaire at I-7; 19 U.S.C. § 1677(4)(B)(ii)(III).

³⁹ CR/PR at Table III-2; 19 U.S.C. § 1677(4)(B)(ii)(III).

⁴⁰ Petitioner’s Prehearing Br. at 3-6.

⁴¹ CR/PR at Table III-1.

⁴² CR/PR at Table III-1.

⁴³ CR/PR at Table III-14.

⁴⁴ CR/PR at Table III-14.

⁴⁵ CR/PR at Table III-18.

2023, and \$*** in interim 2024 compared to \$*** in interim 2023.⁴⁶ *** ratio of operating income to net sales was above the industry average throughout the POI.⁴⁷

Because *** ratio of subject imports to domestic production remained relatively low and stable throughout the POI, and *** was the *** domestic producer in 2023, *** principal interest would appear to be in domestic production. Furthermore, *** significant capital expenditures reflect a commitment to domestic production. There is also no evidence on the record that *** imports of subject merchandise or its affiliation with a subject producer and exporter acted to shield it from the effects of subject import competition or otherwise benefitted its domestic production operations to such an extent that its inclusion in the domestic industry would mask injury. Given these considerations, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry as a related party.

***. *** was the *** largest domestic producer of TBTs in 2023, accounting for *** percent of U.S. production that year.⁴⁸ *** on the petition.⁴⁹ *** imported small quantities of subject merchandise from Thailand in 2022 (equivalent to *** percent of its U.S. production) and 2023 (equivalent to *** percent of its U.S. production).⁵⁰ *** reported importing subject merchandise during the POI in order ***.⁵¹

Given that *** imported TBTs from Thailand only in 2022 and 2023, when its ratio of subject imports to domestic production remained *** low, its principal interest would appear to be domestic production. Nor is there any evidence on the record that *** subject imports benefitted its domestic production operations to such an extent that its inclusion in the domestic industry would mask injury. In view of these factors, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry under the related parties provision.

⁴⁶ *** U.S. Producer Questionnaire at III-13a. *** also reported research and development expenses totaling \$*** in 2021, \$*** in 2022, \$*** in 2023, \$*** in interim 2023, and \$*** in interim 2024. *Id.*

⁴⁷ As a ratio to net sales, *** operating income was *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was *** percent in interim 2024 compared to *** percent in interim 2023. CR/PR at Table VI-3.

⁴⁸ CR/PR at Table III-1.

⁴⁹ CR/PR at Table III-1.

⁵⁰ CR/PR at Table III-15.

⁵¹ CR/PR at Table III-18.

***. *** was the *** largest domestic producer of TBTs in 2023, accounting for *** percent of U.S. production that year.⁵² *** on the petition.⁵³ *** imports of subject merchandise were *** tires in 2021, *** tires in 2022, and *** tires in 2023; they were *** tires in interim 2024, compared to *** tires in interim 2023.⁵⁴ As a ratio to its U.S. production, *** subject imports were *** percent in 2021, *** percent in 2022, and *** percent in 2023; the ratio was *** percent in interim 2024, compared to *** percent in interim 2023.⁵⁵ *** reported importing subject merchandise during the POI ***.⁵⁶ *** ratio of operating income to net sales was above the industry average throughout the POI.⁵⁷

Because *** ratio of subject imports to domestic production remained low throughout the POI, *** principal interest would appear to be domestic production. Nor is there any evidence on the record that *** subject imports benefitted its domestic production operations such that its inclusion in the domestic industry would mask injury. In view of these factors, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry under the related parties provision.

. *** was the *** largest domestic producer in 2023, accounting for *** percent of U.S. production that year.⁵⁸ *** the petition.⁵⁹ *** imports of subject merchandise, including those by ***'s affiliated U.S. importers, were *** tires in 2021, *** tires in 2022, *** tires in 2023, and *** tires in interim 2024, compared to *** tires in interim 2023.⁶⁰ As a ratio to its U.S. production, *** and its affiliated importer's subject imports were *** percent in 2021, *** percent in 2022, and *** percent in 2023; the ratio was *** percent in interim 2024, compared to *** percent in interim 2023.⁶¹ *** reported importing subject merchandise during the POI because ***.⁶² *** made substantial capital expenditures for its domestic production operations during the POI, including \$ in 2021, 2022, and 2023, and \$*** in interim 2024,

⁵² CR/PR at Table III-1.

⁵³ CR/PR at Table III-1.

⁵⁴ CR/PR at Table III-16.

⁵⁵ CR/PR at Table III-16.

⁵⁶ CR/PR at Table III-18.

⁵⁷ As a ratio to net sales, *** operating income was *** percent in 2021, *** percent in 2022, *** percent in 2023, *** percent in interim 2023, and *** percent in interim 2024. CR/PR at Table VI-3.

⁵⁸ CR/PR at Table III-1.

⁵⁹ CR/PR at Table III-1.

⁶⁰ CR/PR at Table III-17; *see also* U.S. Importers' Questionnaire Responses of *** & *** at Part II-7a.

⁶¹ CR/PR at Table III-17.

⁶² CR/PR at Table III-18.

compared to \$*** in interim 2023.⁶³ *** ratio of operating income to net sales was below the industry average in 2021, 2022, and interim 2024, but above the industry average in 2023 and interim 2023.⁶⁴

Because the ratio of *** subject imports to *** domestic production was low during the 2021-2023 period and was *** low in interim 2024, *** principal interest would appear to be domestic production. Further, *** substantial capital expenditures reflect a commitment to domestic production. There is also no evidence on the record that *** imports of subject merchandise or affiliation with a subject producer and exporter and U.S. importer acted to shield it from subject import competition or otherwise benefitted its domestic production operations to such an extent that its inclusion in the domestic industry would mask injury. Given these considerations, and the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry under the related parties provision. .

Accordingly, consistent with our definition of the domestic like product, we define the domestic industry as all domestic producers of TBTs.

IV. Negligibility

Pursuant to section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product shall be deemed negligible if they account for less than three percent (or four percent in the case of a developing country in a countervailing duty investigation) of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition.⁶⁵

During the 12-month period preceding the filing of the petitions (October 2022 through September 2023), subject imports from Thailand accounted for 39.8 percent of total imports of TBTs.⁶⁶ Because subject imports exceed the three percent negligibility threshold, we find that imports of TBTs subject to the antidumping duty investigation are not negligible.

⁶³ *** U.S. Producer Questionnaire at III-13a. *** did not report any research and development expenses during the POI. *Id.*

⁶⁴ As a ratio to net sales, *** operating income was *** percent in 2021, *** percent in 2022, *** percent in 2023, *** percent in interim 2023, and *** percent in interim 2024. CR/PR at Table VI-3.

⁶⁵ 19 U.S.C. §§ 1671d(b), 1673d(b), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

⁶⁶ CR/PR at Table IV-4.

V. Material Injury by Reason of Subject Imports

Based on the record in the final phase of this investigation, we find that an industry in the United States is materially injured by reason of imports of TBTs from Thailand that Commerce has found to be sold in the United States at less than fair value.

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.⁶⁷ In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.⁶⁸ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁶⁹ In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.⁷⁰ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁷¹

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,⁷² it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.⁷³ In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price

⁶⁷ 19 U.S.C. §§ 1671d(b), 1673d(b).

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

⁶⁹ 19 U.S.C. § 1677(7)(A).

⁷⁰ 19 U.S.C. § 1677(7)(C)(iii).

⁷¹ 19 U.S.C. § 1677(7)(C)(iii).

⁷² 19 U.S.C. §§ 1671d(b), 1673d(b).

⁷³ *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.⁷⁴

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.⁷⁵ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.⁷⁶ Nor does

⁷⁴ The Federal Circuit, in addressing the causation standard of the statute, observed that “[a]s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” See also *Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

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

⁷⁶ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports . . . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); see also *Softwood* (Continued...)

the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.⁷⁷ It is clear that the existence of injury caused by other factors does not compel a negative determination.⁷⁸

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”⁷⁹ The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”⁸⁰ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”⁸¹

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial

(...Continued)

Lumber from Canada, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), *citing Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

⁷⁷ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

⁷⁸ *See Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

⁷⁹ *Mittal Steel*, 542 F.3d at 876, 878; *see also id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”), *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swift-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

⁸⁰ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

⁸¹ *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

evidence standard.⁸² Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.⁸³

B. Conditions of Competition

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

1. Demand

U.S. demand for TBTs depends on the demand for domestically produced trucks and buses.⁸⁴ TBTs are used both on new vehicles in the OEM market and as replacement tires for vehicles in the aftermarket.⁸⁵ Demand for TBTs sold to OEMs is driven by truck sales, while demand for TBTs sold to the aftermarket is driven by truck tonnage and mileage.⁸⁶

Three of five responding U.S. producers reported that overall U.S. demand for TBTs has increased since January 1, 2021, while two U.S. producers reported that overall U.S. demand was unchanged.⁸⁷ Responses by U.S. importers and purchasers were mixed. Seven of 19 responding importers reported that overall U.S. demand increased since January 1, 2021, seven importers reported no change in demand, and five importers reported that demand declined.⁸⁸ Six of 15 responding U.S. purchasers reported that overall U.S. demand increased since January 1, 2021, five purchasers reported no change in demand, and four purchasers reported that demand declined.⁸⁹

Apparent U.S. consumption of TBTs increased from 29.9 million tires in 2021 to 36.2 million tires in 2022, but then declined to 28.3 tires million tires in 2023, a level 5.4 percent

⁸² We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

⁸³ *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

⁸⁴ CR/PR at II-9.

⁸⁵ CR/PR at II-1.

⁸⁶ CR/PR at II-9. U.S. heavy truck sales fluctuated, but increased overall during the POI. CR/PR at II-9, Figure II-1, and Table II-5. Truck tonnage fluctuated, but was virtually unchanged overall during the POI. CR/PR at II-9, Figure II-2, and Table II-6.

⁸⁷ CR/PR at Table II-7.

⁸⁸ CR/PR at Table II-7.

⁸⁹ CR/PR at Table II-7.

lower than in 2021.⁹⁰ Apparent U.S. consumption of TBTs was 12.4 percent higher in interim 2024, at 15.5 million tires, than in interim 2023, at 13.8 million tires.⁹¹

2. Supply

The domestic industry had the largest share of the U.S. market in 2021 and 2023, and it was the second-largest supply source for the remainder of the POI, although its market share generally declined. The domestic industry's share of apparent U.S. consumption fluctuated, but decreased overall by 3.7 percentage points between 2021 and 2023, decreasing from 41.4 percent in 2021 to 34.1 percent in 2022, before increasing to 37.7 percent in 2023.⁹² The domestic industry's share of apparent U.S. consumption was 4.0 percentage points lower in interim 2024, at 34.0 percent, than in interim 2023, at 38.0 percent.⁹³

In 2023, the four largest domestic producers of TBTs accounted for approximately *** percent of domestic production: Bridgestone, which accounted for *** percent of domestic production, followed by Continental (*** percent), Goodyear (***), and Michelin (*** percent).⁹⁴ During the POI, the domestic industry experienced various plant closings due to the COVID-19 pandemic, as well as expansions and other structural changes.⁹⁵ The domestic industry's practical production capacity declined from 15.4 million tires in 2021 to 15.0 million tires in 2022 and 14.6 million tires in 2023; it was lower in interim 2024, at 7.4 million tires, compared to 7.5 million tires in interim 2023.⁹⁶ The industry's capacity utilization rate increased from 88.5 percent in 2021 to 90.0 percent in 2022, but then declined to 86.9 percent in 2023, for an overall decline of 1.5 percentage points from 2021 to 2023.⁹⁷ The industry's capacity utilization was 4.8 percentage points lower in interim 2024, at 84.4 percent, compared

⁹⁰ CR/PR at Tables IV-6 & C-1.

⁹¹ CR/PR at Tables IV-6 & C-1.

⁹² CR/PR at Tables IV-6 & C-1.

⁹³ CR/PR at Tables IV-6 & C-1.

⁹⁴ CR/PR at Table III-1.

⁹⁵ CR/PR at Tables III-3 & III-4. Three domestic producers (***) reported that they experienced prolonged shutdowns and production curtailments since January 1, 2021 due to the COVID-19 pandemic. CR/PR at Table III-4. *** U.S. producers, ***, expanded their operations for TBTs during the POI. In May 2023, Bridgestone broke ground on a new \$60 million retread facility for TBTs in Texas. CR/PR at Table III-3. Bridgestone also broke ground on a new \$550 million plant for TBTs in Tennessee in August 2023. *Id.* ***. CR/PR at Table III-4. In June 2024, *** agreed to sell tire assets of \$905 million to Yokohama under a five-year tolling provision from current Goodyear off-the-road tire and TBT plants worldwide as part of its "Goodyear Forward" reorganization plan. CR/PR at Table III-3.

⁹⁶ CR/PR at Table C-1.

⁹⁷ CR/PR at Table C-1.

to 89.2 percent in interim 2023.⁹⁸ The industry's end-of-period inventories increased by 75.0 percent overall from 2021 to 2023, increasing from 2.0 million tires in 2021 to 2.3 million tires in 2022 and 3.4 million tires in 2023; its end-of-period inventories were 23.8 percent higher in interim 2024, at 4.0 million tires, than in interim 2023, at 3.3 million tires.⁹⁹ Accordingly, notwithstanding reported supply constraints,¹⁰⁰ the domestic industry had substantial available capacity and growing inventories to supply the U.S. market for TBTs, particularly later in the POI.¹⁰¹

Subject imports had a smaller presence in the U.S. market than either the domestic industry or nonsubject imports, although their market share increased irregularly from 2021 to 2023 and was higher in interim 2024 than in interim 2023. Subject imports' share of apparent U.S. consumption increased by 1.1 percentage points overall from 2021 to 2023, increasing from 24.1 percent in 2021 to 28.2 percent in 2022, before declining to 25.2 percent in 2023; their share of apparent U.S. consumption was 4.1 percentage points higher in interim 2024, at 27.3 percent, than in interim 2023, at 23.3 percent.¹⁰²

Nonsubject imports were the second largest supply source to the U.S. market in 2021 and 2023, and they were the largest supply source for the remainder of the POI. Their share of apparent U.S. consumption increased by 2.6 percentage points overall from 2021 to 2023, increasing from 34.5 percent in 2021 to 37.8 percent in 2022, before declining to 37.1 percent in 2023.¹⁰³ Their share of apparent U.S. consumption was 0.1 percentage point lower in interim 2024, at 38.7 percent, than in interim 2023, at 38.8 percent.¹⁰⁴ The largest sources of nonsubject imports during the POI, in order of size, were Vietnam, Japan, China, Canada, and South Korea.¹⁰⁵ Nonsubject imports of TBTs from China have been subject to antidumping and

⁹⁸ CR/PR at Table C-1.

⁹⁹ CR/PR at Table C-1.

¹⁰⁰ A majority of responding U.S. producers reported supply constraints, while a majority of importers and purchasers reported no supply constraints during the POI. CR/PR at II-7-8 & Table II-4. All domestic producers that reported supply constraints indicated that such constraints occurred only in 2021 and 2022 and were related to the COVID-19 pandemic, while importers and purchasers that reported supply constraints indicated that they experienced such constraints in 2021, 2022, and 2023. *Id.* Most U.S. purchasers reported that domestic producers of TBTs had supply constraints much more frequently than importers or foreign producers of TBTs. CR/PR at II-7 & Table II-4.

¹⁰¹ CR/PR at Table C-1.

¹⁰² CR/PR at Tables IV-6 & C-1.

¹⁰³ CR/PR at Tables IV-6 & C-1.

¹⁰⁴ CR/PR at Tables IV-6 & C-1.

¹⁰⁵ CR/PR at II-7 & Tables IV-2, IV-6, C-1.

countervailing duty orders since 2019, and they have been subject to additional duties pursuant to section 301 of the Tariff Act of 1974¹⁰⁶ since 2018.¹⁰⁷

3. Substitutability and Other Conditions

Based on the record in the final phase of this investigation, we find that there is a moderate-to-high degree of substitutability between the domestic like product and subject imports.¹⁰⁸ Virtually all responding U.S. purchasers (***) of (***) purchasers) and most responding U.S. importers (***) of (***) importers) reported that the domestic like product and subject imports were always or frequently interchangeable.¹⁰⁹ Responding U.S. producers were more divided on this question. (***) responding U.S. producers reported that the domestic like product and subject imports were always interchangeable, while the other (***) producers reported that they were sometimes interchangeable.¹¹⁰ When asked to compare subject imports with the domestic like product regarding 21 purchasing factors, the majority of purchasers reported that the domestic like product was either superior or comparable to subject imports with respect to 20 factors but inferior to subject imports with respect to price (meaning that subject imports were priced lower than the domestic like product).¹¹¹ In comparing the domestic like product with subject imports, all responding domestic producers reported that differences other than price were sometimes or never significant.¹¹² Although the responses from responding U.S. importers and purchasers were more mixed, the majority of responding importers and purchasers also reported that differences other than price were sometimes or never significant.¹¹³ Factors that may limit the substitutability of domestically-

¹⁰⁶ 19 U.S.C. § 2411.

¹⁰⁷ CR/PR at I-4-6 & I-9. Imports of TBTs from China became subject to additional Section 301 duties of 10 percent *ad valorem* effective September 2018, which were increased to 25 percent *ad valorem* effective May 10, 2019. CR/PR at I-9.

¹⁰⁸ CR/PR at II-13.

¹⁰⁹ CR/PR at Table II-20.

¹¹⁰ CR/PR at Table II-20.

¹¹¹ CR/PR at Table II-15. Majorities or pluralities of purchasers rated the domestic like product superior to subject imports in terms of certain product characteristics, including brand, delivery time, quality exceeding industry standards, and retreadability, while large minorities reported U.S. product superior in terms of availability, delivery terms, durability/wear resistance, fuel efficiency, quality meets industry standards, minimum quantity requirements, product range, sold under contract with services, safety, and technical support/service. *Id.*

¹¹² CR/PR at Table II-21.

¹¹³ CR/PR at Table II-21.

produced TBTs and subject imports include perceived differences in quality and product services.¹¹⁴

We also find that price is an important factor in purchasing decisions, along with other important factors such as quality and availability. Responding purchasers most frequently ranked quality (18 firms) followed by price (16 firms) and availability (12 firms) as among the top three factors influencing their purchasing decisions for TBTs.¹¹⁵ Although the majority of purchasers reported that price was “very important” in purchasing decisions, more purchasers cited availability, reliability of supply, safety, quality meeting industry standards, and product consistency as “very important” in their purchasing decisions.¹¹⁶ Other “very important” factors reported by the majority or large minorities of purchasers include delivery time, delivery terms, durability/wear resistance, and technical support/service/warranty.^{117 118}

The majority of purchasers (13 of 23) reported that they sometimes purchase the lowest-priced product, while two reported that they always, four reported that they usually, and four reported that they never purchase the lowest-priced truck and bus tires.¹¹⁹ Nevertheless, the majority of purchasers (14 of 25 purchasers) reported that they always or usually made purchasing decisions based on brand, although a large minority of purchasers (11 of 25 purchasers) reported that they only sometimes or never made purchasing decisions based on brand.¹²⁰ The majority of purchasers (12 of 23 purchasers) reported that their customers only sometimes or never made purchasing decisions based on brand, while an almost equal number of purchasers (11 of 23 purchasers) reported that their customers always or frequently

¹¹⁴ CR/PR at II-13.

¹¹⁵ CR/PR at Table II-9. The most frequently cited most important factor considered by purchasers of TBTs in their purchasing decisions were price (7 purchasers), quality (6 purchasers), and availability (4 purchasers). *Id.* The most frequently cited second-most important factor considered by purchasers of TBTs in their purchasing decisions were quality (6 purchasers), availability (5 purchasers), price (4 purchasers), and relationship with supplier (4 purchasers). *Id.* The most frequently cited third-most important factor considered by purchasers of TBTs in their purchasing decisions were quality (6 purchasers), price (5 purchasers), availability (3 purchasers), and product range (3 purchasers). *Id.* Additionally, there were a number of factors considered to be at least “somewhat important” by the majority of purchasers, including delivery terms, discounts offered, durability/wear resistance, fuel efficiency, major brand, payment terms, product range, quality exceeds industry standards, retreadability, and U.S. transportation costs. *Id.*

¹¹⁶ CR/PR at Table II-10.

¹¹⁷ CR/PR at Table II-10.

¹¹⁸ CR/PR at Table II-10.

¹¹⁹ CR/PR at II-16.

¹²⁰ CR/PR at Table II-19.

made purchasing decisions based on brand.¹²¹ The record indicates that purchasers perceive certain quality and service differences associated with brand distinctions, including warranties, retreadability, and network service and support coverage, and that some purchasers also are willing to pay more for high-quality tires.¹²² Accordingly, the record indicates that the combination of branding and various quality distinctions can lead purchasers to purchase TBTs that are not the lowest priced.

TBTs are subject to certain federal safety regulations administered principally by the U.S. Department of Transportation, National Highway Traffic Safety Administration, and the Federal Motor Carrier Safety Administration.¹²³ These regulations specify the type of equipment on which the tire is used, the tire type and size, the speed and load carrying ply ratings, and sidewall marking standards.¹²⁴

TBTs are produced in a large variety of models and sizes for use on a wide range of commercial vehicles.¹²⁵ TBTs are offered at a range of price points depending on their size, end-use application, and particular features (*e.g.*, load range, warranties, environmental certifications, rolling resistance).¹²⁶ All six responding U.S. producers and the vast majority of importers (22 of 26) and purchasers (19 of 24) reported that the U.S. market for TBTs is divided into tiers.¹²⁷ Most firms identified four major tiers in the U.S. market for TBTs, with some reporting five tiers.¹²⁸ These different tiers represent varying levels of quality, service, and price.¹²⁹ TBTs in the top tier of the market typically are higher priced, and have the reputation for higher quality and better performance and service features in terms of warranties and services than truck and bus tires in lower tiers.¹³⁰ Domestic producers reported that the largest

¹²¹ CR/PR at Table II-19.

¹²² CR/PR at II-31.

¹²³ CR/PR at I-9, I-13, & I-19.

¹²⁴ CR/PR at I-9-10.

¹²⁵ CR/PR at I-7-15.

¹²⁶ CR/PR at I-7-15 & Tables V-5-8.

¹²⁷ CR/PR at II-25.

¹²⁸ CR/PR at II-25. We note that the questionnaires did not provide a definition for each tier, and instead left it to firms to self-identify these categories. *See* Petitioner's Prehearing Br. at 12. However, the fact that most firms were able to identify four tiers indicates that there is broad recognition of distinct product categories in this market.

¹²⁹ CR/PR at II-29.

¹³⁰ CR/PR at II-13, II-25-28, and Appendix D. Responding firms reported a wide variety of factors that in their view differentiated tires in different tiers, including durability, perceived quality, price, reputation, and brand. CR/PR at II-27-28. According to responding firms, tier 1 tires are manufactured for premium/advertised brands, sold at the highest price, and are the highest quality; tier 2 tires are mid-market/offshore brands with some consumer recognition and long wear time; tier 3 tires are not (Continued...)

share of their sales (81.1 percent) during the POI were concentrated in the top tier (Tier 1), with lesser amounts being reported as Tier 2 (16.5 percent) and Tier 3 (2.4 percent).¹³¹ Although U.S. importers reported that the largest share of subject import sales during the POI were in Tier 4 (34.0 percent) and Tier 3 (31.6 percent), they reported substantial sales in Tier 1 (***) percent) and lesser but appreciable sales in Tier 2 (***) percent).¹³² Accordingly, the record in the final phase of this investigation indicates that there is substantial competition between domestically-produced TBTs and subject imports from Thailand within the primary tiers, tiers 1-3.¹³³

Moreover, the record indicates that purchasers typically compare prices for TBTs both within and across tiers,¹³⁴ although some purchasers are willing to pay higher prices in order to obtain tires in higher tiers because they identify superior product features in the higher tier tires.¹³⁵ In addition, some purchasers (*i.e.*, OEMs and large fleets) tend to focus their purchases mainly on Tier 1 with some purchases in Tier 2 and limited purchases in tier 3 because Tiers 1 and 2 have better fleet support and national accounts.¹³⁶

All five responding U.S. producers, 21 of 30 responding U.S. importers, and 19 of 25 responding U.S. purchasers indicated that the U.S. market for TBTs was subject to business cycles.¹³⁷ According to responding firms, demand for TBTs is seasonal and tends to be higher during the warmer weather months (*i.e.*, March through October).¹³⁸

During the POI, the domestic like product and nonsubject imports were sold predominantly in the aftermarket, with smaller but substantial quantities sold to OEMs.¹³⁹

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recognized/value brands that are commodity products with basic designs; and tier 4 tires are “other brands,” including private label brands, that are less uniform, commodity products. *Id.*

¹³¹ CR/PR at II-13.

¹³² CR/PR at II-13. U.S. importers reported only a very small share of subject import sales in Tier 5 (***) percent). *Id.*

¹³³ *See, e.g.*, CR/PR at II-13, II-25-30; Petitioner’s Prehearing Br. at 9-16; Petitioner’s Posthearing Br. at 1-5.

¹³⁴ CR/PR at II-30 & Table II-17 (15 of 20 purchasers reported that they usually or always compare prices of TBTs between tiers, three reported they sometimes do, and only two reported that they never compare prices between tiers).

¹³⁵ CR/PR at Table II-16 & II-27-29.

¹³⁶ CR/PR at II-27-28. These purchasers will sometimes consider purchasing only Tier 1 tires or only Tier 1 and Tier 2 tires. *Id.*

¹³⁷ CR/PR at II-12.

¹³⁸ CR/PR at II-12.

¹³⁹ CR/PR at Table II-1. U.S. producers’ commercial U.S. shipments were 29.3 percent to OEMs and 70.7 percent to the aftermarket in 2021, 31.0 percent to OEMs and 69.0 percent to the aftermarket (Continued...)

Subject imports from Thailand were sold overwhelmingly to the aftermarket throughout the POI, with much smaller but appreciable quantities sold to OEMs.¹⁴⁰

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, price lists, and transfer price agreements with transaction-by-transaction negotiations being the most common method for U.S. producers and price lists being the most common method for U.S. importers.¹⁴¹ Domestic producers reported that *** of their commercial U.S. shipments were sold through long-term contracts in 2023 (*** percent), but also reported selling TBTs through spot sales (*** percent), short-term contracts (*** percent), and annual contracts (*** percent).¹⁴² U.S. importers reported that *** of their commercial U.S. shipments were sold through spot sales in 2023 (*** percent), but also reported selling TBTs through short-term contracts (*** percent), long-term contracts (*** percent), and annual contracts (*** percent).¹⁴³ U.S. producers and importers generally reported that their contracts fixed price and quantity, although their responses were mixed in terms of whether contracts for OEMs and aftermarket sales were indexed to raw material costs.¹⁴⁴

During the POI, U.S. producers sold overwhelmingly from U.S. inventory, with appreciable quantities produced to order.¹⁴⁵ Specifically, U.S. producers reported that the

(...Continued)

in 2022, 35.0 percent to OEMs and 65.0 percent to the aftermarket in 2023, and 38.2 percent to OEMs and 61.8 percent to the aftermarket in interim 2024, compared to 36.8 percent to OEMs and 63.2 percent to the aftermarket in interim 2023. CR/PR at Table II-1. U.S. importers' commercial U.S. shipments of nonsubject imports were 24.2 percent to OEMs and 75.8 percent to the aftermarket in 2021, 24.8 percent to OEMs and 75.2 percent to the aftermarket in 2022, 26.8 percent to OEMs and 73.2 percent to the aftermarket in 2023, and 24.4 percent to OEMs and 75.6 percent to the aftermarket in interim 2024, compared to 29.9 percent to OEMs and 73.1 percent to the aftermarket in interim 2023. *Id.*

¹⁴⁰ CR/PR at Table II-1. U.S. importers' commercial U.S. shipments of subject imports were 8.3 percent to OEMs and 91.7 percent to the aftermarket in 2021, 7.6 percent to OEMs and 92.4 percent to the aftermarket in 2022, 12.1 percent to OEMs and 87.9 percent to the aftermarket in 2023, and 13.2 percent to OEMs and 86.8 percent to the aftermarket in interim 2024, compared to 12.4 percent to OEMs and 87.6 percent to the aftermarket in interim 2023. *Id.*

¹⁴¹ CR/PR at Table V-3.

¹⁴² CR/PR at Table V-4.

¹⁴³ CR/PR at Table V-4.

¹⁴⁴ CR/PR at V-4. Most U.S. producers reported that long-term contracts for OEMs are indexed to raw material costs and that long-term contracts for aftermarket sales are not indexed to raw material costs. *Id.* Most importers reported that short-term contracts for aftermarket sales are not indexed to raw material costs. *Id.*

¹⁴⁵ CR/PR at Table II-11.

majority of their commercial U.S. shipments during the 2021-2023 period (89.7 to 92.2 percent) came from U.S. inventory, with lead times averaging 11 to 13 days.¹⁴⁶ U.S. producers reported that their remaining commercial U.S. shipments during the period (ranging from 7.8 to 10.3 percent) were produced to order, with lead times averaging 39 to 42 days.¹⁴⁷ Importers reported that the highest percentage (39.0 to 50.2 percent) of their commercial U.S. shipments of TBTs were produced to order during the 2021-2023 period, with lead times averaging 102 to 107 days.¹⁴⁸ The remainder of their commercial U.S. shipments during the period were from U.S. inventories (30.9 to 38.6 percent), with lead times averaging 6 to 9 days, or foreign inventories (17.5 to 22.4 percent), with lead times averaging 88 to 114 days.¹⁴⁹

The principal raw material used in the production of TBTs is rubber.¹⁵⁰ The price of synthetic rubber increased by 42.3 percent from January 2021 through June 2024, and the price of natural rubber increased by 10.9 percent over the same period.¹⁵¹

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”¹⁵²

The volume of subject imports declined irregularly by 1.2 percent from 2021 to 2023 but was 32.0 percent higher in interim 2024 than in interim 2023.¹⁵³ The volume of subject imports increased from 7.2 million tires in 2021 to 10.2 million tires in 2022 but declined to 7.1 million tires in 2023; it was 4.2 million tires in interim 2024, as compared to 3.2 million tires in interim 2023.¹⁵⁴

As a share of apparent U.S. consumption, subject imports increased by 1.1 percentage points between 2021 and 2023, and were 4.1 percentage points higher in interim 2024

¹⁴⁶ CR/PR at Table II-11.

¹⁴⁷ CR/PR at Table II-11.

¹⁴⁸ CR/PR at Table II-11.

¹⁴⁹ CR/PR at Table II-11.

¹⁵⁰ CR/PR at V-1. Raw materials used in the production of truck and bus tires include natural rubber, synthetic rubber, carbon black, oils, and steel. *Id.*

¹⁵¹ CR/PR at Tables V-1-2, and Figures V-1-2.

¹⁵² 19 U.S.C. § 1677(7)(C)(i).

¹⁵³ CR/PR at Tables IV-2 & C-1.

¹⁵⁴ CR/PR at Tables IV-2 & C-1. U.S. importers’ U.S. shipments of subject imports increased from *** tires in 2021 to *** tires in 2022 but declined to *** tires in 2023. CR/PR at Appendix E, Table C-2. Their U.S. shipments of subject imports were lower in interim 2024, at *** tires, than in interim 2023, at *** tires. *Id.*

compared with interim 2023.¹⁵⁵ The share of apparent U.S. consumption accounted for by subject imports increased from 24.1 percent in 2021 to 28.2 percent in 2022 before declining to 25.2 percent in 2023; subject import market share was 27.3 percent in interim 2024, compared with 23.3 percent in interim 2023.¹⁵⁶ ¹⁵⁷ Nearly all of the increase in subject import market share over the POI was at the direct expense of the domestic industry.¹⁵⁸

Based on the foregoing, we find that the volume of subject imports is significant in both absolute terms and relative to consumption in the United States and that the increase in the volume of subject imports relative to apparent U.S. consumption is significant.

D. Price Effects of the Subject Imports

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

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

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹⁵⁹

As previously discussed in section V.B.3., we find that there is a moderate-to-high degree of substitutability between the domestic like product and subject imports, and that price is an important factor in purchasing decisions for TBTs, among other important factors.

The Commission collected quarterly quantity and f.o.b. pricing data on sales of four pricing products shipped to unrelated U.S. customers during the POI, with separate pricing data collected for OEM and aftermarket sales.¹⁶⁰ Four domestic producers and 25 importers

¹⁵⁵ CR/PR at Tables IV-6 & C-1.

¹⁵⁶ CR/PR at Tables IV-6 & C-1.

¹⁵⁷ The ratio of subject imports to domestic production increased from 53.0 percent in 2021 to 75.3 percent in 2022, but declined to 56.2 percent in 2023; it was higher in interim 2024, at 67.7 percent, than in interim 2023, at 47.8 percent. CR/PR at Table IV-2.

¹⁵⁸ CR/PR at Table IV-6.

¹⁵⁹ 19 U.S.C. § 1677(7)(C)(ii).

¹⁶⁰ The four pricing products are as follows:

Product 1.-- Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph);

(Continued...)

provided usable pricing data, although not all firms reported pricing for all products for all quarters.¹⁶¹ Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of TBTs and approximately *** percent of importers' U.S. shipments of TBTs from Thailand in 2023.¹⁶²

The pricing data show universal underselling by subject imports. Subject imports undersold domestically produced TBTs in all 82 quarterly comparisons, at margins ranging from 0.3 to 66.5 percent and averaging 32.7 percent.¹⁶³ On a volume basis, there were 6.5 million tires of reported subject import sales in quarters of underselling.¹⁶⁴ Most of the reported subject import sales volume, *** percent, was for sales of Products 1 and 3, which were the highest-volume pricing products for both domestically produced TBTs and subject imports during the POI.¹⁶⁵

Given the moderate-to-high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, and the universal underselling by subject imports with respect to all quarterly comparisons and reported subject import sales volume, we find that there has been significant underselling by subject imports during the POI. Subject imports gained 1.1 percentage points of market share at the expense of the domestic industry from 2021 to 2023 and an additional 4.0 percentage points of market share at the expense of the domestic industry in the interim period. As discussed further

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Product 2.-- Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph);

Product 3.-- Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph); and

Product 4.— Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

CR/PR at V-6.

¹⁶¹ CR/PR at V-6.

¹⁶² CR/PR at V-6.

¹⁶³ CR/PR at Table V-11.

¹⁶⁴ CR/PR at Table V-11.

¹⁶⁵ *Derived from* CR/PR at Tables V-4-10. We have also considered lost sales information. Of the 26 responding purchasers, six purchasers reported that, since 2021, they had purchased subject merchandise instead of domestically-produced TBTs, and five of these six responding purchasers reported that subject import prices were lower than U.S. prices. CR/PR at Table V-12. Two of these five purchasers reported purchasing *** units of subject imports instead of domestically-produced TBTs primarily because of their lower price, representing *** percent of responding purchasers' total purchases over the entire POI. See CR/PR at Tables V-12-13.

below, we find that the significant underselling by subject imports led to a shift in market share from the domestic industry to subject imports over the POI.¹⁶⁶

We have also considered price trends. During the POI, domestic prices generally increased for all four pricing products.¹⁶⁷ Between January 2021 and June 2024, domestic producer sales prices for the four pricing products increased by *** percent to *** percent for aftermarket sales and from *** percent to *** percent for OEM sales, depending on the pricing product.¹⁶⁸ For OEM sales, prices for subject imports increased over the POI by *** percent for product 1 and *** percent for product 3.¹⁶⁹ For aftermarket sales, prices for subject imports increased by *** percent for product 2 and *** percent for product 3, but declined by *** percent for product 1 and *** percent for product 2.¹⁷⁰

We have also considered whether subject imports prevented price increases for domestically produced TBTs which otherwise would have occurred to a significant degree. The domestic industry's ratio of COGS to net sales increased steadily by 5.9 percentage points from 2021 to 2023, increasing from 75.2 percent in 2021 to 76.4 percent in 2022 and 81.1 percent in 2023.¹⁷¹ The domestic industry's ratio of COGS to net sales was 0.9 percentage points higher in interim 2024, at 80.4 percent, than in interim 2023, at 79.5 percent.¹⁷² The domestic industry's COGS-to-net-sales ratio increased as its average net sales unit value increased to a lesser degree than its unit COGS from 2021 to 2023 and in interim 2024 compared to interim 2023.¹⁷³

¹⁶⁶ CR/PR at Tables IV-6 & C-1. The domestic industry lost 1.1 percentage points of market share to subject imports during the 2021-2023 period. *Id.* The domestic industry's share of apparent U.S. consumption was 4.0 percentage points lower in interim 2024, at 34.0 percent, compared with interim 2023, at 38.0 percent. *Id.* In contrast, subject imports' share of apparent U.S. consumption was 4.1 percentage points higher in interim 2024, at 27.3 percent, compared with interim 2023, at 23.3 percent. *Id.* Nonsubject imports' share of apparent U.S. consumption was 0.1 percentage point lower in interim 2024, at 38.7 percent, compared with interim 2023, at 38.8 percent. *Id.*

¹⁶⁷ CR/PR at Tables V-5-9. Out of the twenty responding purchasers, two reported that U.S. producers had reduced prices to compete with lower-priced subject imports with U.S. producers' price reductions ranging from *** percent, 12 reported no price reductions by the domestic industry, and six reported that they did not know of price reductions by the domestic industry. CR/PR at V-25.

¹⁶⁸ CR/PR at Table V-9. For aftermarket sales, U.S. producers' prices increased over the POI by *** percent for product 1, *** percent for product 2, *** percent for product 3, and *** percent for product 4. *Id.* For sales to OEMs, U.S. producers' prices increased over the POI by *** percent for product 1, *** percent for product 2, *** percent for product 3, and *** percent for product 4. *Id.*

¹⁶⁹ CR/PR at Table V-9. There only one quarter of reported subject import pricing data for products 2 and 4 for the OEM sector. *Id.*

¹⁷⁰ CR/PR at Table V-9.

¹⁷¹ CR/PR at Tables VI-1 & C-1.

¹⁷² CR/PR at Table C-1.

¹⁷³ CR/PR at Table C-1.

From 2021 to 2023, the domestic industry's unit COGS increased by \$65.00 per unit (or by 29.8 percent).¹⁷⁴ At the same time, the domestic industry's unit net sales value increased by only \$59.00 per unit (or by 20.4 percent), which did not keep pace with the industry's increasing costs over the period.¹⁷⁵ Similarly, the domestic industry's unit COGS were \$4.00 higher (or 1.5 percent higher) in interim 2024 than in interim 2023, while the industry's unit net sales value was only \$1.00 higher (or 0.4 percent higher).¹⁷⁶ ¹⁷⁷ As a result, the domestic industry experienced a cost-price squeeze from 2021 to 2023 and in interim 2024 compared to interim 2023. We thus find that subject imports significantly suppressed prices for the domestic like product as they prevented the domestic industry from increasing prices commensurately with rising costs during the POI.

We find that demand trends cannot explain the domestic industry's cost-price squeeze during the POI. Although apparent U.S. consumption decreased irregularly by 5.4 percent from 2021 to 2023,¹⁷⁸ we find no clear correlation between demand trends during the POI and the domestic industry's inability to increase prices sufficiently to cover its increasing costs. Most market participants reported that U.S. demand for TBTs either increased or was unchanged over the POI,¹⁷⁹ and the domestic industry's COGS-to-net-sales ratio increased not only when apparent U.S. consumption declined between 2022 and 2023, but also when apparent U.S. consumption increased between 2021 and 2022 and in interim 2024 compared to interim 2023.¹⁸⁰

¹⁷⁴ CR/PR at Tables VI-1 & C-1. The domestic industry's total COGS increased from \$218 per unit in 2021 to \$259 per unit in 2022 and \$283 per unit in 2023. *Id.* This increase included overall increases from 2021 to 2023 in raw material costs of \$34 per unit, direct labor costs of \$16 per unit and other factory costs by \$16 per unit. *Id.* The domestic industry's per-unit raw material costs increased from \$117 per unit in 2021 to \$146 per unit in 2022 and \$151 per unit in 2023. *Id.* The industry's per-unit direct labor costs increased from \$45 per unit in 2021 to \$55 per unit in 2022 and \$61 per unit in 2023. *Id.* The industry's per-unit other factory costs increased from \$56 per unit in 2021 to \$63 per unit in 2022 and \$72 per unit in 2023. *Id.*

¹⁷⁵ CR/PR at Tables VI-1 & C-1. The domestic industry's net sales AUV increased from \$290 per unit in 2021 to \$339 per unit in 2022 and \$349 per unit in 2023. *Id.*

¹⁷⁶ CR/PR at Table VI-1 & C-1. The domestic industry's net sales AUVs were \$349 per unit in interim 2024 compared with \$348 per unit in interim 2023. *Id.*

¹⁷⁷ CR/PR at Tables VI-1 & C-1. The domestic industry's total COGS were \$281 per unit in interim 2024 compared with \$277 per unit in interim 2023. *Id.*

¹⁷⁸ CR/PR at Table IV-6 & C-1.

¹⁷⁹ CR/PR at Table II-7.

¹⁸⁰ CR/PR at Tables VI-1 & C-1. The domestic industry's ratio of COGS to net sales increased from 75.2 percent in 2021 to 76.4 percent in 2022, despite the 20.9 percent increase in apparent U.S. consumption during the period, and was 80.4 percent in interim 2024, up from 79.5 percent in interim 2023, even though apparent U.S. consumption was 12.4 percent higher in interim 2024 than in interim 2023. (Continued...)

During the POI, the domestic industry was faced with the choice of either foregoing needed price increases to defend its market share against low-priced subject imports or increasing its prices to cover its increased costs at the expense of losing market share to subject imports. The domestic industry's COGS-to-net-sales ratio increased 5.9 percentage points during the 2021-2023 period as the industry restrained its price increases in an effort to compete with significant volumes of low-priced subject imports on price, limiting the domestic industry's overall loss of market share to subject imports to 1.1 percentage points during the period.¹⁸¹ By contrast, when the domestic industry raised its prices in interim 2024 compared to interim 2023 to improve profitability resulting in only a 0.9 percentage point increase in its COGS-to-net sales ratio during the period, it lost 4.0 percentage points of market share to subject imports.¹⁸²

In sum, we find that significant underselling by subject imports caused subject imports to gain market share from the domestic industry and suppressed prices for the domestic like product to a significant degree. We therefore find that subject imports had significant price effects.

E. Impact of the Subject Imports¹⁸³

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."¹⁸⁴ These factors include output, sales, inventories, capacity

(...Continued)

2023. *Id.* Only between 2022 and 2023 was the increase in the industry's COGS to net sales ratio, from 76.4 percent in 2022 to 81.1 percent in 2023, accompanied by a decline in apparent U.S. consumption, of 21.8 percent. *Id.*

¹⁸¹ CR/PR at Table C-1.

¹⁸² CR/PR at Tables VI-1 & C-1

¹⁸³ The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations of sales at less value, Commerce found antidumping duty margins ranging from 12.33 to 48.39 percent. *Final AD Determination*, 89 Fed. Reg. 83,636 at 83,637. We take into account in our analysis the fact that Commerce has made final findings that all subject producers in Thailand are selling subject imports in the United States at less than fair value. Further, our analysis of the significant underselling of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

¹⁸⁴ 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also (Continued...)

utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development (“R&D”), and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁸⁵

During the POI, the domestic industry’s production, capacity utilization, and U.S. shipments declined, its inventories increased, and its employment indicators were mixed. The industry’s financial indicators, including its gross profit, operating income, net income, and operating margin all sharply declined over the POI. Although apparent U.S. consumption declined irregularly from 2021 to 2023, significant volumes of low-priced subject imports captured market share from the domestic industry, particularly in interim 2024 compared to interim 2023 when apparent U.S. consumption increased, and suppressed domestic prices to a significant degree, irrespective of demand trends.

The domestic industry’s output related indicia generally declined overall between 2021 and 2023, and they were lower in interim 2024 compared with interim 2023. The industry’s capacity declined by 5.1 percent from 2021 to 2023, declining from 15.4 million tires in 2021 to 15.0 million tires in 2022 and 14.6 million tires in 2023.¹⁸⁶ Its capacity was 1.4 percent lower in interim 2024, at 7.4 million tires, than in interim 2023, at 7.5 million tires.¹⁸⁷ The industry’s production declined by 6.7 percent from 2021 to 2023, declining from 13.6 million tires in 2021 to 13.5 million tires in 2022 and 12.7 million tires in 2023.¹⁸⁸ Its production was 6.7 percent lower in interim 2024, at 6.3 million tires, than in interim 2023, at 6.7 million tires.¹⁸⁹ The industry’s capacity utilization declined irregularly by 1.5 percentage points from 2021 to 2023, increasing from 88.5 percent in 2021 to 90.0 percent in 2022, before declining to 86.9 percent in 2023.¹⁹⁰ Its capacity utilization was 4.8 percentage points lower in interim 2024, at 84.4 percent, than in interim 2023, at 89.2 percent.¹⁹¹

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may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.”).

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

¹⁸⁶ CR/PR at Tables III-6 & C-1.

¹⁸⁷ CR/PR at Tables III-6 & C-1.

¹⁸⁸ CR/PR at Tables III-6 & C-1.

¹⁸⁹ CR/PR at Tables III-6 & C-1.

¹⁹⁰ CR/PR at Tables III-6 & C-1.

¹⁹¹ CR/PR at Tables III-6 & C-1.

The domestic industry's employment-related performance indicia were mixed. The domestic industry's number of production and related workers ("PRWs") and total hours worked increased from 2021 to 2023, but were both lower in interim 2024 than in interim 2023.¹⁹² The industry's wages paid and hourly wages increased from 2021 to 2023, and were both higher in interim 2024 than in interim 2023.¹⁹³ The industry's productivity declined steadily from 2021 to 2023, however, and was lower in interim 2024 than in interim 2023.¹⁹⁴

The domestic industry's quantity of U.S. shipments declined by 13.8 percent overall from 2021 to 2023, declining from 12.4 million tires in 2021, to 12.3 million tires in 2022, and 10.7 million tires in 2023; it was 0.6 percent higher in interim 2024, at 5.3 million tires, than in interim 2023, at 5.2 million tires.¹⁹⁵ The domestic industry's share of apparent U.S. consumption declined irregularly by 3.7 percentage points from 2021 to 2023, declining from 41.4 percent in 2021, to 34.1 percent in 2022, before increasing to 37.7 percent in 2023; it was 4.0 percentage points lower in interim 2024, at 34.0 percent, than in interim 2023, at 38.0 percent.¹⁹⁶

The domestic industry's end-of-period inventories increased overall by 75.0 percent from 2021 to 2023, increasing from 2.0 million tires in 2021 to 2.3 million tires in 2022 and 3.4 million tires in 2023; they were 23.8 percent higher in interim 2024, at 4.0 million tires, than in interim 2023, at 3.3 million tires.¹⁹⁷ As a ratio to total shipments, the domestic industry's end-

¹⁹² CR/PR at Tables III-19 & C-1. The domestic industry's number of PRWs increased by 10.2 percent from 2021 to 2023, increasing from 8,207 PRWs in 2021 to 8,771 PRWs in 2022 and 9,407 PRWs in 2023; they were 0.8 percent lower in interim 2024, at 8,870 PRWs, than in interim 2023, at 8,945 PRWs. *Id.* Total hours worked increased by 4.8 percent from 2021 to 2023, increasing from 16.2 million hours in 2021 to 16.6 million hours in 2022 and 16.9 million hours in 2023; they were 2.6 percent lower in interim 2024, at 8.4 million hours, than in interim 2023, at 8.6 million hours. *Id.*

¹⁹³ CR/PR at Tables III-19 & C-1. Wages paid increased by 21.1 percent from 2021 to 2023, increasing from \$502.8 million in 2021 to \$577.3 million in 2022 and \$608.6 million in 2023; they were 3.0 higher in interim 2024, at \$315.4 million, than in interim 2023, at \$306.2 million. *Id.* Hourly wages increased by 16.0 percent from 2021 to 2023, increasing from \$31.00 per hour in 2021 to \$34.71 per hour in 2022 and \$35.95 per hour in 2023; they were 5.8 percent higher in interim 2024, at \$37.59 per hour, than in interim 2023, at \$33.54 per hour. *Id.*

¹⁹⁴ CR/PR at Tables III-19 & C-1. Productivity declined by 10.6 percent from 2021 to 2023, declining from 839.0 tires per 1,000 hours in 2021 to 814.0 tires per 1,000 hours in 2022 and 750.0 tires per 1,000 hours in 2023; it was 4.2 percent lower in interim 2024, at 747.0 tires per 1,000 hours in interim 2024, than in interim 2023, at 780.0 tires per 1,000 hours. *Id.*

¹⁹⁵ CR/PR at Tables III-11 & C-1.

¹⁹⁶ CR/PR at Table IV-6 & C-1

¹⁹⁷ CR/PR at Tables III-13 & C-1.

of-period inventories were 6.6 percentage points higher in interim 2024, at 35.3 percent, than in interim 2023, at 28.7 percent.¹⁹⁸

Virtually all of the domestic industry's financial performance indicators declined overall from 2021 to 2023, and they were generally weaker in interim 2024 than in interim 2023. The domestic industry's net sales revenue increased irregularly by 3.6 percent from 2021 to 2023, increasing from \$3.9 billion in 2021, to \$4.5 billion in 2022, before decreasing to \$4.0 billion in 2023; it was 1.3 percent higher in interim 2024, at \$2.0 billion, than in interim 2023, at \$2.0 billion.¹⁹⁹ The industry's gross profits decreased irregularly by 20.9 percent from 2021 to 2023, increasing from \$963.3 million in 2021, to \$1.1 billion in 2022, before decreasing to \$761.8 million in 2023; it was 3.1 percent lower in interim 2024, at \$392.5 million, than in interim 2023, at \$405.1 million.²⁰⁰ The industry's operating income declined irregularly by 44.6 percent from 2021 to 2023, increasing from \$546.2 million in 2021, to \$608.3 million in 2022, before declining to \$302.4 million in 2023; it was 26.8 lower in interim 2024, at \$134.0 million, than in interim 2023, at \$183.1 million.²⁰¹ Its net income declined irregularly by *** percent from 2021 to 2023, increasing from *** in 2021, to \$*** in 2022, before decreasing to \$*** in 2023; it was *** percent lower in interim 2024, at \$***, than in interim 2023, at \$***.²⁰² Its operating income as a ratio to net sales decreased by 6.5 percentage points from 2021 to 2023, declining from 14.0 percent in 2021, to 13.5 percent in 2022, and 7.5 percent in 2023; it was 2.6 percentage points lower in interim 2024, at 6.7 percent, than in interim 2023, at 9.3 percent.²⁰³ Its net income as a ratio to net sales decreased by *** percentage points from 2021 to 2023, declining from *** percent in 2021, to *** percent in 2022, and *** percent in 2023; it was *** percentage points lower in interim 2024, at *** percent, than in interim 2023, at *** percent.²⁰⁴

Although the domestic industry's capital expenditures, research and development expenses ("R&D expenses"), and net assets all increased during the POI, its return on assets declined.²⁰⁵ Also, several domestic producers reported negative effects on investment due to subject imports during the POI.²⁰⁶

¹⁹⁸ CR/PR at Tables III-13 & C-1.

¹⁹⁹ CR/PR at Tables VI-1 & C-1.

²⁰⁰ CR/PR at Tables VI-1 & C-1.

²⁰¹ CR/PR at Tables VI-1 & C-1.

²⁰² CR/PR at Tables VI-1 & C-1.

²⁰³ CR/PR at Tables VI-1 & C-1.

²⁰⁴ CR/PR at Tables VI-1 & C-1.

²⁰⁵ CR/PR at Tables VI-7, VI-9, VI-11, VI-12, and C-1. Specifically, the domestic industry's capital expenditures increased by 218.1 percent from 2021 to 2023, increasing from \$103.8 million in 2021, to (Continued...)

Subject import volume was significant throughout the POI and gained market share at the domestic industry's expense through significant underselling, capturing 1.1 percentage points of market share from the industry during the 2021-2023 period and 4.0 percentage points of market share in interim 2024 compared to interim 2023.²⁰⁷ Consequently, the domestic industry experienced declining capacity, production, capacity utilization, U.S. shipments, and net sales value during the POI, including in interim 2024 compared to interim 2023 when higher apparent U.S. consumption should have improved these measures of industry performance. As significant volumes of low-priced subject imports suppressed prices for the domestic like product to a significant degree, the industry's inability to increase its prices sufficiently to cover its increased costs also led to declining financial performance, including declining operating income, net income, and operating and net income margins. We accordingly find that subject imports had a significant impact on the domestic industry.

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. We find that supply constraints on the part of U.S. producers cannot explain the market share shift from the domestic industry to subject imports during the POI. While a majority of domestic producers reported supply constraints, a majority of responding purchasers did not and all domestic producers that reported supply constraints indicated that such constraints occurred only in 2021 and 2022 and were related to the COVID-19 pandemic.²⁰⁸ Further, we note that the industry's end-of-period inventories increased by 75.0 percent overall from 2021 to 2023, increasing from 2.0 million tires in 2021 to 2.3 million tires in 2022 and 3.4 million tires in 2023 and were 23.8 percent higher in interim 2024, at 4.0 million

(...Continued)

\$177.1 million in 2022, and \$330.0 million in 2023; it was 21.9 percent higher in interim 2024, at \$137.5 million, than in interim 2023, at \$112.8 million. CR/PR at Tables VI-7 & C-1. Its R&D expenses increased by 18.1 percent from 2021 to 2023, increasing from \$83.3 million in 2021, to \$85.9 million in 2022, and \$98.4 million in 2023; it was 31.9 percent higher in interim 2024, at \$58.3 million, than in interim 2023, at \$44.2 million. CR/PR at Tables VI-9 & C-1. Its total net assets increased from \$2.5 billion in 2021, to \$2.9 billion in 2022, and \$3.0 billion in 2023, while its return on assets decreased from 21.7 percent in 2021, to 21.3 percent in 2022, and 10.0 percent in 2023. CR/PR at Tables VI-11, VI-12, and C-1.

²⁰⁶ CR/PR at Table VI-14.

²⁰⁷ CR/PR at Table C-1. The domestic industry's share of apparent U.S. consumption was 4.0 percentage points lower in interim 2024, at 34.0 percent, compared with interim 2023, at 38.0 percent. *Id.* In contrast, subject imports' share of apparent U.S. consumption was 4.1 percentage points higher in interim 2024, at 27.3 percent, compared with interim 2023, at 23.3 percent. *Id.* Nonsubject imports' share of apparent U.S. consumption was 0.1 percentage point lower in interim 2024, at 38.7 percent, compared with interim 2023, at 38.8 percent. *Id.*

²⁰⁸ CR/PR at II7 & Table II-4.

tires, than in interim 2023, at 3.3 million tires.²⁰⁹ Domestic producers also had available capacity throughout the POI.²¹⁰ Accordingly, notwithstanding reported domestic industry supply constraints, the domestic industry had substantial available capacity and growing inventories to supply the U.S. market for TBTs during the POI and to the extent supply constraints reported in 2021 and 2022 affected domestic producer supply those constraints were resolved by the latter part of the POI, including in interim 2024 when subject imports gained 4.1 percentage points of market share.²¹¹

We find that demand conditions, including the 5.4 percent decline in reported apparent U.S. consumption between 2021 and 2023,²¹² cannot explain the domestic industry's difficulties. As discussed in Section V.E. above, demand trends cannot explain the domestic industry's increasing COGS-to-net-sales ratio during the POI because the ratio increased not only when apparent U.S. consumption declined between 2022 and 2023, but also when apparent U.S. consumption increased between 2021 and 2022 and in interim 2024 compared to interim 2023.²¹³ Moreover, the domestic industry's production and U.S. shipments declined by more than the decline in apparent U.S. consumption from 2021 to 2023, as the industry lost 1.1 percentage points of market share to subject imports.²¹⁴ Nor was the domestic industry able to capitalize on the 12.4 percent increase in apparent U.S. consumption in interim 2024 compared to interim 2023, as subject imports captured an additional 4.1 percentage points from the industry over the period.²¹⁵

We recognize that nonsubject imports were present in greater quantities than subject imports throughout the POI and that nonsubject imports increased their market share more than subject imports, by 1.5 percentage points, from 2021 to 2023.²¹⁶ Only subject imports

²⁰⁹ CR/PR at Tables III-13 & C-1.

²¹⁰ CR/PR at Table C-1.

²¹¹ CR/PR at Tables III-6, III-13, C-1. U.S. producers' capacity utilization rate during the POI was 88.5 percent in 2021, 90.0 percent in 2022, and 86.9 percent in 2023; it was 89.2 percent in interim 2023 and 84.4 percent in interim 2024. *Id.* at Tables III-6, C-1.

²¹² CR/PR at Tables IV-6 & C-1.

²¹³ CR/PR at Table VI-1 & C-1.

²¹⁴ While apparent U.S. consumption declined overall by 5.4 percent from 2021 to 2023, the domestic industry's production and U.S. shipments declined overall by 6.7 percent and 13.8 percent, respectively, during the 2021-2023 period. CR/PR at Table C-1.

²¹⁵ CR/PR at Table C-1.

²¹⁶ *Derived from* CR/PR at Table C-1. As a share of apparent U.S. consumption, nonsubject imports increased overall by 2.6 percentage points from 2021 to 2023, increasing from 34.5 percent in 2021 to 37.8 percent in 2022, before decreasing to 37.1 percent in 2023. CR/PR at Table C-1. As a share of apparent U.S. consumption, subject imports increased overall by 1.1 percentage points from 2021 to (Continued...)

captured market share from the domestic industry in interim 2024 compared to interim 2023, however, as the market share of nonsubject imports was 0.1 percentage point lower while subject imports' market share was 4.1 percentage points higher over the interim periods.²¹⁷ Moreover, sales prices for nonsubject imports were generally higher than the sales prices for subject imports throughout the POI, indicating that nonsubject imports were not priced as aggressively as subject imports.²¹⁸ Therefore, nonsubject imports cannot fully explain the injury that we have attributed to subject imports.

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

VI. Critical Circumstances

A. Legal Standards and Party Arguments

In its final antidumping duty determination, Commerce found that critical circumstances exist with respect to subject imports from Thailand produced by Bridgestone Tire Manufacturing (Thailand) Co., Ltd.²¹⁹ Because we have determined that the domestic industry is materially injured by reason of subject imports from Thailand, we must further determine “whether the imports subject to the affirmative {Commerce critical circumstances}

(...Continued)

2023, increasing from 24.1 percent in 2021 to 28.2 percent in 2022, before declining to 25.2 percent in 2023. *Id.*

²¹⁷ CR/PR at Table C-1. Subject imports' share of apparent U.S. consumption was 4.1 percentage points higher in interim 2024, at 27.3 percent, compared with interim 2023, at 23.3 percent. *Id.* Nonsubject imports' share of apparent U.S. consumption was 0.1 percentage point lower in interim 2024, at 38.7 percent, compared with interim 2023, at 38.8 percent. *Id.*

²¹⁸ *See generally* CR/PR at Appendix F. Seven importers reported price data for China and Vietnam for products 1-4 sold to OEMs and to the aftermarket. Price data reported by these firms accounted for 18.3 percent of U.S. commercial shipments from China and 22.7 percent from Vietnam. *Id.* at F-3. In comparing China pricing data with Thailand pricing data, prices for product imported from China were lower than prices for product imported from Thailand in 5 instances and higher in 51 instances. *Id.* In comparing Vietnam pricing data with Thailand pricing data, prices for product imported from Vietnam were lower than prices for product imported from Thailand in 15 instances and higher in 41 instances. *Id.* We note that AUVs for subject imports were generally lower than AUVs for nonsubject imports except for nonsubject imports from China and Vietnam. CR/PR at Table C-1. We note, however, that AUV comparisons may be influenced by differences in product mix and changes in product mix over time and are therefore less instructive than pricing data.

²¹⁹ CR/PR at IV-10.

determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued.”²²⁰

The SAA indicates that the Commission is to determine “whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order” and specifically “whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order.”²²¹ The legislative history for the critical circumstances provision indicates that the provision was designed “to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}.”²²² An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period 90 days prior to the suspension of liquidation.

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

- (I) the timing and the volume of the imports,
- (II) a rapid increase in inventories of the imports, and
- (III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.²²³

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petition with those subsequent to the filing of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.²²⁴

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

²²¹ SAA at 877.

²²² *ICC Industries, Inc. v United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. Rep. No. 96-317 at 63 (1979), *aff'g* 632 F. Supp. 36 (Ct. Int'l Trade 1986). See 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

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

²²⁴ See *Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-43, 731-TA-1095-97, USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-61 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

B. Party Arguments

Petitioner has not addressed the issue of critical circumstances in the final phase of this investigation.

Bridgestone argues that the criteria for finding critical circumstances have not been met. It argues that U.S. imports and inventories of subject imports from Thailand subject to Commerce's critical circumstances determination did not increase by the requisite magnitude.²²⁵ It also argues that other circumstances, including that the domestic industry as a whole remained profitable during the POI, confirm that the remedial effect of any order does not require retroactive duties.²²⁶

C. Analysis

We first consider the appropriate period for comparisons in our critical circumstances analysis of pre-petition and post-petition levels of subject imports from Thailand. The petition in this investigation was filed on October 17, 2023. The Commission frequently relies on comparisons of the six-month periods preceding and following filing of the petitions, but has relied on shorter periods when Commerce's preliminary determination applicable to the country at issue fell within the six-month post-petition period the Commission typically considers.²²⁷ This is not the case in this investigation, however, as Commerce's preliminary determination was issued on May 20, 2024, after the last month in the six-month post-petition period of November 2023 through April 2024.²²⁸ We therefore compare the volume of subject imports in the six months prior to the filing of the petitions (May 2023 – October 2023) with the

²²⁵ Bridgestone Final Comments at 4-8.

²²⁶ Bridgestone Final Comments at 9-10.

²²⁷ See *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547, 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sept. 2016); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. No. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4630 at 35-40 (July 2016); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination was during the sixth month after the petition).

We note that the Commission is not required to examine the same periods that Commerce examined in performing the critical circumstances analysis. See *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007); *Steel Concrete Reinforcing Bars from Turkey*, Inv. No. 731-TA-745 (Final), USITC Pub. 3034 at 34 (Apr. 1997).

²²⁸ CR/PR at IV-10 & Table IV-5.

volume of subject imports in the six months after the filing of the petitions (November 2023 – April 2024) for purposes of our critical circumstances analysis in this investigation.²²⁹

Subject imports from Thailand subject to Commerce's affirmative critical circumstances determination declined from *** tires in the pre-petition period to *** tires in the post-petition period, a decline of *** percent.²³⁰ Nor was there any stockpiling of subject imports after the filing of the petition, as Bridgestone ***.²³¹

In light of these considerations, we do not find that the imports from Thailand subject to Commerce's affirmative critical circumstances determination are likely to undermine seriously the remedial effect of the antidumping duty order. Consequently, we find that critical circumstances do not exist with respect to subject imports from Thailand subject to Commerce's affirmative determination of critical circumstances.

VII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of imports of TBTs from Thailand found by Commerce to be sold in the United States at less than fair value. We also find that critical circumstances do not exist with respect to imports of TBTs from Thailand that are subject to Commerce's final affirmative critical circumstances determination.

²²⁹ CR/PR at Table IV-5.

²³⁰ CR/PR at Table IV-5.

²³¹ CR/PR at IV-12. Bridgestone reported ***. *Id.*

Part I: Introduction

Background

This investigation result from a petition filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO, CLC (“USW”), Pittsburgh, Pennsylvania, on October 17, 2023, alleging that an industry in the United States is materially injured and threatened with material injury by reason of less-than-fair-value (“LTFV”) imports of truck and bus tires¹ from Thailand. Table I-1 presents information relating to the background of this investigation.^{2 3}

Table I-1
Truck and bus tires: Information relating to the background and schedule of this proceeding

Effective date	Action
October 17, 2023	Petition filed with Commerce and the Commission; institution of the Commission's investigation (88 FR 74208, October 30, 2023)
November 6, 2023	Commerce's notice of initiation (88 FR 77960, November 14, 2023)
December 1, 2023	Commission's preliminary determination (88 FR 84831, December 6, 2023)
May 20, 2024	Commerce's preliminary determination (89 FR 43806, May 20, 2024)
May 20, 2024	Scheduling of final phase of Commission investigation (89 FR 49903, June 12, 2024)
June 20, 2024	Revision to schedule of final phase of Commission investigation (89 FR 53119, June 25, 2024)
August 5, 2024	Revision to schedule of final phase of Commission investigation following tolled deadlines at Commerce (89 FR 65396, August 9, 2024)
October 17, 2024	Commerce's final determination (89 FR 83636, October 17, 2024)
October 15, 2024	Commission's hearing
November 8, 2024	Commission's vote
December 2, 2024	Commission's views

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

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

³ Appendix B presents the witnesses appearing at the Commission's hearing.

Statutory criteria

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

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

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

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

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

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

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

Organization of report

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

Market summary

Truck and bus tires generally are used on a large number of types and sizes of vehicles designed to transport heavy cargo and passengers over roads and highways. The leading U.S. producers of truck and bus tires are Bridgestone Americas Tire Operations, LLC (“Bridgestone Americas”), The Goodyear Tire and Rubber Company (“Goodyear”), and Continental Tire the Americas, LLC (“Continental Tire”), while producers of truck and bus tires outside the United States include Bridgestone Tire Manufacturing (Thailand) Co. Ltd., Deestone Corporation Public Company Limited of Thailand, Huayi Group (Thailand) Company Limited (“Huayi Group”), and Prinx Chengshan Tire (Thailand) Co., Ltd. The leading U.S. importers of truck and bus tires from Thailand are ***. Leading importers of product from nonsubject countries (primarily Vietnam, Canada, and Japan) include

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

***.⁶ U.S. purchasers of truck and bus tires are firms that typically are OEMs, sell to dealers, or sell directly to fleet owners; leading purchasers include ***.

Apparent U.S. consumption of truck and bus tires totaled approximately 28.3 million tires (\$7.4 billion) in 2023. Currently, seven firms are known to produce truck and bus tires in the United States. U.S. producers' U.S. shipments of truck and bus tires totaled 10.7 million tires (\$3.8 billion) in 2023 and accounted for 37.7 percent of apparent U.S. consumption by quantity and 50.6 percent by value. U.S. imports from Thailand totaled 7.1 million tires (\$1.2 billion) in 2023 and accounted for 25.2 percent of apparent U.S. consumption by quantity and 15.7 percent by value. U.S. imports from nonsubject sources totaled 10.5 million tires (\$2.5 billion) in 2023 and accounted for 37.1 percent of apparent U.S. consumption by quantity and 33.7 percent by value.

Summary data and data sources

A summary of data collected in this investigation is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of seven firms that accounted for the entirety of U.S. production of truck and bus tires during 2023. U.S. imports are based on U.S. imports are based on questionnaire responses of 32 U.S. importers of truck and bus tires, representing 66.9 percent of U.S. imports in 2023, including 67.6 percent from Thailand and 66.5 percent from nonsubject sources, and on official import statistics of the U.S. Department of Commerce for HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020.

Previous and related investigations

Truck and bus tires have been the subject of one prior countervailing and antidumping duty investigations in the United States.⁷ Those investigations resulted from petitions filed by the USW, Pittsburgh, Pennsylvania, on January 29, 2016, alleging that an industry in the United

⁶ ***.

⁷ The Commission has also conducted antidumping and countervailing duty investigations on passenger vehicle and light truck ("PVL") tires and off-the-road ("OTR") tires, both of which are outside the scope of this investigation.

States was materially injured and threatened with material injury by reason of LTFV and subsidized imports of truck and bus tires from China. On January 27, 2017, Commerce determined that imports of truck and bus tires from China were being sold at LTFV and subsidized by the government of China,⁸ while on March 17, 2017, the Commission determined that the domestic industry was not materially injured or threatened with material injury by reason of imports of truck and bus tires from China.⁹

The petitioner appealed the Commission's negative determination to the U.S. Court of International Trade. The Court upheld the challenged aspects of the Commission's determination regarding conditions of competition and impact, but remanded a certain aspect of the Commission's analysis of price effects.¹⁰ The Court also remanded certain aspects of the Commission's negative threat determination pertaining to its analysis of countervailable subsidies and likely price effects.¹¹ Following the Court's remand order, the Commission instituted remand proceedings, and on January 30, 2019, the Commission determined that an industry in the United States was materially injured by reason of subject imports of truck and bus tires from China that were sold in the United States at LTFV and subsidized by the government of China.¹² On February 15, 2019, Commerce issued its antidumping and countervailing duty orders on imports of truck and bus tires from China with the final weighted average dumping margins ranging from 9.00 to 22.75 percent and net subsidy margins ranging from 20.98 to 63.34 percent.¹³

On January 2, 2024, the Commission instituted five-year reviews of these outstanding orders, and on April 8, 2024, the Commission voted to conduct expedited reviews of these

⁸ 82 FR 8606, January 27, 2017.

⁹ 82 FR 14232, March 17, 2017. In the Commission's original determinations, three Commissioners reached negative determinations (then-Vice Chairman Johanson and Commissioners Broadbent and Kieff) while two Commissioners reached affirmative present material injury determinations (then-Chairman Schmidlein and Commissioner Williamson). Truck and Bus Tires from China, Investigation Nos. 701-TA-556 and 731-TA-1311 (Final), USITC Publication 4673, March 2017.

¹⁰ *United Steel, Paper and Forestry, Rubber, Mfg., Energy, Allied Indus. and Serv. Workers Int'l Union v. United States*, Slip Op. 18-151 (Ct. Int'l Trade Nov. 1, 2018) ("Slip-Op 18-151").

¹¹ Slip Op. 18-151 at 14-18.

¹² 84 FR 4855, February 19, 2019. Commissioners Kearns, Williamson, and Schmidlein determined that an industry in the United States was materially injured by reason of subject imports of truck and bus tires from China that were sold in the United States at less than fair value and subsidized by the government of China. Chairman Johanson and Commissioner Broadbent determined that an industry in the United States was neither materially injured nor threatened with material injury by reason of the subject imports. Truck and Bus Tires from China, Investigation Nos. 701-TA-556 and 731-TA-1311 (Final) (Remand), USITC Publication 4877, April 2021, p. 3.

¹³ 84 FR 4436, February 15, 2019, and 84 FR 4434, February 15, 2019.

orders.¹⁴ On April 25, 2024, Commerce determined that revocation of the antidumping duty order on truck and bus tires from China would likely lead to continuation or recurrence of dumping,¹⁵ and on May 15, 2024, Commerce determined that revocation of the countervailing duty order on truck and bus tires from China would likely lead to the continuation or recurrence of countervailable subsidies.¹⁶ Following expedited reviews of the orders, the Commission determined on August 16, 2024, that revocation of the antidumping and countervailing duty orders on truck and bus tires from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹⁷ On August 21, 2024, Commerce issued its continuation order for the antidumping and countervailing duty orders on imports of truck and bus tires from China.¹⁸

Nature and extent of sales at LTFV

On May 20, 2024, Commerce published a notice in the Federal Register of its preliminary determination of sales at LTFV with respect to imports from Thailand, and on October 17, 2024, Commerce published a notice in the Federal Register of its final determination of sales at LTFV with respect to imports from Thailand.¹⁹ Table I-2 presents Commerce’s dumping margins with respect to imports of truck and bus tires from Thailand.

**Table I-2
Truck and bus tires: Commerce’s weighted-average LTFV margins with respect to imports from Thailand**

Exporter/Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Bridgestone Corporation	2.35	48.39
Prinx Chengshan Tire (Thailand) Co., Ltd.	0.00	12.33
All others	2.35	12.33

Source: 89 FR 43806, May 20, 2024; 89 FR 83636, October 17, 2024.

¹⁴ 89 FR 93, January 2, 2024, and 89 FR 45676, May 23, 2024.

¹⁵ 89 FR 31728, April 25, 2024.

¹⁶ 89 FR 42450, May 15, 2024.

¹⁷ 89 FR 67671, August 21, 2024. Commissioner David S. Johanson dissented, determining that material injury was not likely to continue or recur within a reasonably foreseeable time if the antidumping and countervailing duty orders on truck and bus tires from China were revoked. Truck and Bus Tires from China, Inv. Nos. 701-TA-556 and 731-TA-1311 (Review), USITC Publication 5535, August 2024.

¹⁸ 89 FR 70169, August 29, 2024.

¹⁹ 89 FR 43806, May 20, 2024; 89 FR 83636, October 17, 2024.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:²⁰

The scope of the investigation covers truck and bus tires. Truck and bus tires are new pneumatic tires, of rubber, with a truck or bus size designation. Truck and bus tires covered by the scope may be tube-type, tubeless, radial, or non-radial (also known as bias construction or bias-ply). Subject tires have, at the time of importation, the symbol "DOT" on the sidewall, certifying that the tire conforms to applicable motor vehicle safety standards. Subject tires may also have one of the following suffixes in their tire size designation, which also appear on the sidewall of the tire:

TR—Identifies tires for service on trucks or buses to differentiate them from similarly sized passenger car and light truck tires; and

HC—Identifies a 17.5 inch rim diameter code for use on low platform trailers.

All tires with a "TR" or "HC" suffix in their size designations are covered by the scope regardless of their intended use.

In addition, all tires that lack one of the above suffix markings are included in the scope, as well as all tires that include any other prefix or suffix in their sidewall markings, are included in the scope, regardless of their intended use, as long as the tire is of a size that fits trucks or busses. Sizes that fit trucks and busses include, but are not limited to, the numerical size designations listed in the "Truck-Bus" section of the Tire and Rim Association Year Book, as updated annually. The scope includes all tires that are of a size that fits trucks or busses, unless the tire falls within one of the specific exclusions set out below.

Truck and bus tires, whether or not mounted on wheels or rims, are included in the scope. However, if a subject tire is imported mounted on a wheel or rim, only the tire is covered by the scope. Subject merchandise includes truck and bus tires produced in the subject country whether mounted on wheels or rims in the subject country or in a third country. Truck and bus tires are covered whether or not they are accompanied by

²⁰ 89 FR 83636, October 17, 2024.

other parts, e.g., a wheel, rim, axle parts, bolts, nuts, etc. Truck and bus tires that enter attached to a vehicle are not covered by the scope.

Specifically excluded from the scope are the following types of tires: (1) pneumatic tires, of rubber, that are not new, including recycled and retreaded tires; (2) non-pneumatic tires, such as solid rubber tires; and (3) tires that exhibit each of the following physical characteristics: (a) the designation "MH" is molded into the tire's sidewall as part of the size designation; (b) the tire incorporates a warning, prominently molded on the sidewall, that the tire is for "Mobile Home Use Only;" and (c) the tire is of bias construction (also known as non-radial construction) as evidenced by the fact that the construction code included in the size designation molded into the tire's sidewall is not the letter "R."

The subject merchandise is currently classifiable under Harmonized Tariff Schedule of the United States (HTSUS) subheadings: 4011.20.1015 and 4011.20.5020. Tires meeting the scope description may also enter under the following HTSUS subheadings: 4011.90.1010, 4011.90.1050, 4011.90.2010, 4011.90.2050, 4011.90.8010, 4011.90.8050, 8708.70.4530, 8708.70.4546, 8708.70.4548, 8708.70.4560, 8708.70.6030, 8708.70.6045, 8708.70.6060, and 8716.90.5059.

While HTSUS subheadings are provided for convenience and for customs purposes, the written description of the subject merchandise is dispositive.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to this investigation is imported under the Harmonized Tariff Schedule of the United States (HTSUS or HTS) statistical reporting numbers 4011.20.1015 and 4011.20.5020, categories covering commercial on-the-highway truck and bus tires of radial and other ply construction excluding light truck tires. The current general rates of duty for subheadings 4011.20.10 and 4011.20.50 are 4.0 percent and 3.4 percent ad valorem respectively.²¹ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

²¹ Tires meeting the scope description may also be imported under the following HTS statistical reporting numbers: 4011.69.0020, 4011.69.0090, 4011.70.00, 4011.90.80, 4011.99.4520, 4011.99.4590, 4011.99.8520, 4011.99.8590, 8708.70.4530, 8708.70.6030, 8708.70.6060, and 8716.90.5059.

Truck and bus tires produced in China are subject to additional Section 301 duties of 25 percent ad valorem for each HTS subheading, effective since May 10, 2019, up from the original 10 percent duty implemented in September 2018.²² In addition, effective April 9, 2022, normal trade relations with Russia and Belarus were suspended, and column 2 duties of 10 percent applied for each HTS category.²³ During late-July 2022, the column 2 rate of duty on products of Russia classified in HTS subheading 4011.20.10 were increased to 35 percent ad valorem, as set forth in heading 9903.90.08.²⁴

The product

Description and applications

Truck and bus tires defined by the scope of this proceeding are new pneumatic tires of rubber certified by the U.S. Department of Transportation (“DOT”) for on-road or highway use. Such tires are designed to be mounted on heavier commercial vehicles compared to the lighter on-road tires found on consumer passenger vehicles and commercial light trucks. Thus, truck and bus tires are correspondingly designed to support the higher load bearing requirements of commercial vehicle platforms, and also are generally heavier, stronger, and larger. A typical truck and bus tire contains significantly more steel reinforcement and natural rubber content than passenger or light truck tires, and because of its higher strength and bulk these tires typically weigh out in the 100 to 200 pound range, compared to some 40 pounds for a typical light truck tire.²⁵ Commercial tires of this nature are produced in a large variety of types and sizes found on a huge range of truck and bus vehicles, from local delivery and municipal service trucks and buses in urban/regional settings, for example, to the large 18-wheel tractor-trailer rigs and passenger buses found in long-haul higher speed use on highways and interstate systems. Information on the physical property details and Tire and Rim Association (TRA) standards for subject truck and bus tire specifications is presented in figure I-1.

²² Additional China Section 301 Action, 84 FR 26930, June 10, 2019.

²³ Presidential Proclamation, “Suspending Normal Trade Relations with Russia and Belarus Act” (19 U.S.C. 2434 note), 87 FR 38875, June 30, 2022.

²⁴ Presidential Proclamation 10420, “Increasing Duties on Certain Articles from the Russian Federation,” 87 FR 38875, June 30, 2022.

²⁵ U.S. Tire Manufacturers Association, <https://www.ustires.org/innovation>, retrieved August 2024.

**Figure I-1
Truck and bus tires: Tire and Rim Association specifications**

Truck-Bus tire: 11R22.5 H 146/143L		Truck-Bus metric tire: 255/70R22.5 G 138/134L		Truck-Bus Trailer tire: 8R17.5HC F 122/120L	
11	Width of tire cross section (inches)	255	Width of tire cross section in millimeters (10.04 in.)	8	Width of tire cross section (inches)
N/A	Aspect ratio (ratio of sidewall height to section width-%)	70	Aspect ratio (ratio of sidewall height to section width-%)	N/A	Aspect ratio (ratio of sidewall height to section width-%)
R	Radial ply	R	Radial Ply	R	Radial ply
22.5	Rim diameter (inches)	22.5	Rim diameter (inches)	17.5	Rim diameter (inches)
N/A	Suffix	N/A	Suffix	HC	Suffix (For use on low platform trailers)
H	Load Range (16 ply)	G	Load Range (14 ply)	F	Load Range (12 Ply)
146/ 143	Load Index (single/dual) 6,600/6,000 pounds @ 120 psi	138/ 134	Load Index (single/dual) 5,500/5,200 pounds @ 110 psi @110psi@110psi	122/ 120	Load Index (Single/Dual) 3,300/3,100 pounds @110psi
L	Speed Symbol (75 mph)	L	Speed Symbol (75 mph)	L	Speed Symbol (75 mph)

Source: 2024 Yearbook, Tire and Rim Association, pp. 3-01 – 3-30.

TRA standards detail truck and bus tire types and dimensions, radial or bias ply construction, rim size, tire width and sidewall height, weight bearing and air pressure capacities, and speed ratings. These and many more specifications are molded into all subject truck and bus tire sidewalls according to DOT federally mandated safety regulations for all on-road and highway commercial vehicles.

In the industry, truck and bus tires typically are referred to as medium commercial truck tires because they are the types that fit on medium duty DOT classifications of vehicles having gross vehicle weight ratings (“GVWR”) ranging generally from 10,001 to 26,000 pounds (class 3 to 6) exclusive of trailers and other attachments; however, heavy duty vehicles having GVWR ratings of 26,001 to 33,000 pounds and above (class 7 and 8) are significant types of vehicles fitted with truck and bus tires.²⁶ For example, the larger medium duty vehicles classified by DOT include buses, as well as medium size cargo and delivery trucks with 6 tires or more, while the larger heavy duty classifications include large delivery trucks, motor coaches, all tractor-trailer combinations, refuse trucks, and construction vehicles with 10 or more tires.²⁷

Truck and bus tires of varying sizes and design configurations, radial or nonradial, tube type or tubeless, are produced domestically or imported into the United States for mounting to

²⁶ Bridgestone Truck Tire Data Book 2022, “Truck Types by Weight Class,” p. 90.

²⁷ Medium duty trucks are defined in ascending GVWR capacity as Class 3 through 6, and heavy duty as Class 7 and 8. “Field Operations Guide for Safety/Service Patrols,” figure 21, U.S. Department of Transportation, December 2009. <http://ops.fhwa.dot.gov/publications/fhwahop10014/index.htm>, retrieved November 14, 2023.

original equipment (“OE”) vehicles or for the replacement requirements on used vehicles, each subject to the same DOT motor vehicle safety and sidewall marking standards.²⁸ Truck and bus tires for the most part are produced and sold in four main types: (1) Steer tires, the two tires mounted to the front of the vehicle, (2) Drive tires, the tires mounted to the drive train of a given vehicle, (3) Trailer tires, mounted to free-rolling axles as load carriers, and (4) All-position tires, a combination principally of drive and steer tires that may be used in any of the three positions.²⁹ Steer tires are considered the most important tire position. These are the tires at the very front of the vehicle that are responsible for steering. These tires directly affect the handling of the vehicle and the ride for the driver as well as the driver’s ability to safely operate the vehicle. Steer tires typically feature a ribbed tread designed to channel water. Drive position tires are built to handle the stresses and torque of the drive axles, transferring the power produced by the vehicle to the road. Drive tire treads are designed with a focus on traction, often tread blocks or lug tread in design. Trailer position tires are designed for free-rolling axle positions as load carriers. In addition to more robust lug or block-type tread, the steel belt package on drive position tires will typically feature a more robust belt package and possibly a higher number of reinforcing casing plies than steer or trailer position tires.³⁰

Truck and bus tires are designed to fit on two types of rims, the popular 15 degree (15°) drop center rims, and flat base rims. Tires mounted to 15° drop center rims are specifically designed in half-inch rim sizes (14.5 to 24.5 inches) which fit on one piece rims, while those tires mounted to flat base rims are predominately of even inch rim sizes (15.0 to 25.0 inches) designed to fit on multi-piece rims. Tires designed to be mounted on one piece 15° rims may be either of radial or nonradial bias ply construction but are predominately of tubeless steel belted radial design, while those mounted on multi-piece rims may also be of radial or nonradial bias ply design.³¹ ³² The 22.5 inch radial tire is a popular size fitted to long haul trucks, buses, and trailers.³³

²⁸ Federal Motor Vehicle Safety Standard No. 119 (49 CFR 571.119).

²⁹ Bridgestone, Continental, Goodyear, and Michelin Truck Tire Data Books.

³⁰ Double Coin Truck Tire Data and Reference Book, 2023.

³¹ “Tire and Rim Association 2023 Yearbook,” Truck-Bus section.

³² Bias ply tires are not as popular, but one area of use is the intermodal chassis segment on containers, ocean tire containers moving over road. Conference transcript, p. 138 (Coltrane).

³³ A standard 22.5 inch radial truck and bus tire typically has a load range designation of G or H (14 to 16 ply equivalent), and a load index of 134 to 146 (5,200 – 6,600 pounds), with a speed symbol of L, 75 miles per hour. The load range of truck and bus tires can reach up to an M designation, a ply rating of 22, and a load index up to 170, or a load bearing capability of 13,200 pounds. Speed ratings can range from a designation of F (50 miles per hour) to N (87 miles per hour) depending on tire type and use.

Unlike most lighter consumer tires, subject commercial radial truck and bus tires when worn down to a tread depth of 2/32nd inch minimum may be approved for retreading.³⁴ Truck and bus tires may be retreaded, many as much as three times or more, by the same new truck and bus tire producers, namely, Bridgestone Americas, Goodyear, Michelin NA, and Continental Tire, their franchisees, or independent third party dealers.³⁵ This is a cost-effective way of reducing tire costs over the long term. These retreaded tires may be used on all positions, steer, drive, and trailer,³⁶ except for bus tires which by DOT standards must only use new tires at all times on the front wheels.³⁷ Truck tires worn to no more than 2/32nd inch may also be regrooved if kept to a tread depth of 4/32 inch minimum above the top belt.^{38 39}

Radial tire design dominates on-road truck and bus tires produced in the United States and globally in both on-road OE and replacement tire markets.⁴⁰ Radial tires provide superior strength, handling, ride quality, wear resistance, and more efficient rolling performance resulting in fuel savings and mileage advantages, in addition to superior resistance to tire heat buildup (hysteresis) at higher speeds. Indeed, essentially all producers offer models of SmartWay verified fuel-efficient low rolling resistance radial truck-bus tires for class 8 long-haul tractor-trailers. Producers also offer a wide range of tire types equipped with digital pressure-temperature sensors, proprietary casings and tread designs.^{41 42} Although truck and bus tires continue to be available in the market in both radial and bias construction, tube and tubeless, bias ply tire demand appears to be limited to certain existing markets.⁴³

Figure I-2 compares steel belted radial body ply construction, predominately used for truck and bus tires, to that of bias ply construction.

³⁴ Casings approved for retreading must pass a rigorous series of non-destructive radiological and physical internal and external inspections. Tire Retread and Repair Information Bureau (TRIB), <https://www.retread.org>, retrieved October 16, 2024.

³⁵ Modern Tire Dealer, "2023 Top 50 Retreaders in the U.S.," April 19, 2023.

³⁶ Once the tread on a truck and bus tire wears to its useful limit, the casing of the tire will often be retreaded, and a steer position tire may become a drive position or trailer position retreaded tire. And that tire may then again be retreaded into another tire position. Conference transcript, p. 50 (Drake) and p. 132 (Felberbaum).

³⁷ 49 CFR 393.75.

³⁸ Bridgestone, Continental, Goodyear, and Michelin Truck Tire Data Books.

³⁹ Federal Motor Vehicle Safety Standard No. 119 (49 CFR 571.119); 49 CFR 393.75.

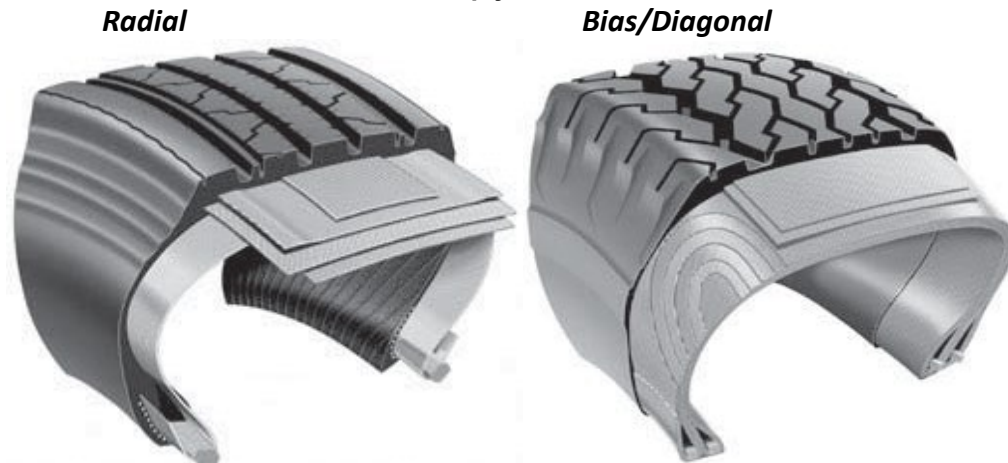
⁴⁰ "U.S. Tire Industry Facts," U.S. Tire Manufacturers Association, ("USTMA"), 2023.

⁴¹ U.S. Environmental Protection Agency (EPA), "SmartWay verified list for low rolling resistance (LRR) new and retread tire technologies," <https://www.epa.gov/verified-diesel-tech/smartway-verified-list-low-rolling-resistance-lrr-new-and-retread-tire>, retrieved November 20, 2023.

⁴² Continental 2023 Truck-Bus Tire Data Book.

⁴³ Conference transcript, p. 138 (Coltrane).

Figure I-2
Truck and bus tires: Radial and bias ply construction



Source: "Bridgestone 2024 Truck Tire Data Book."

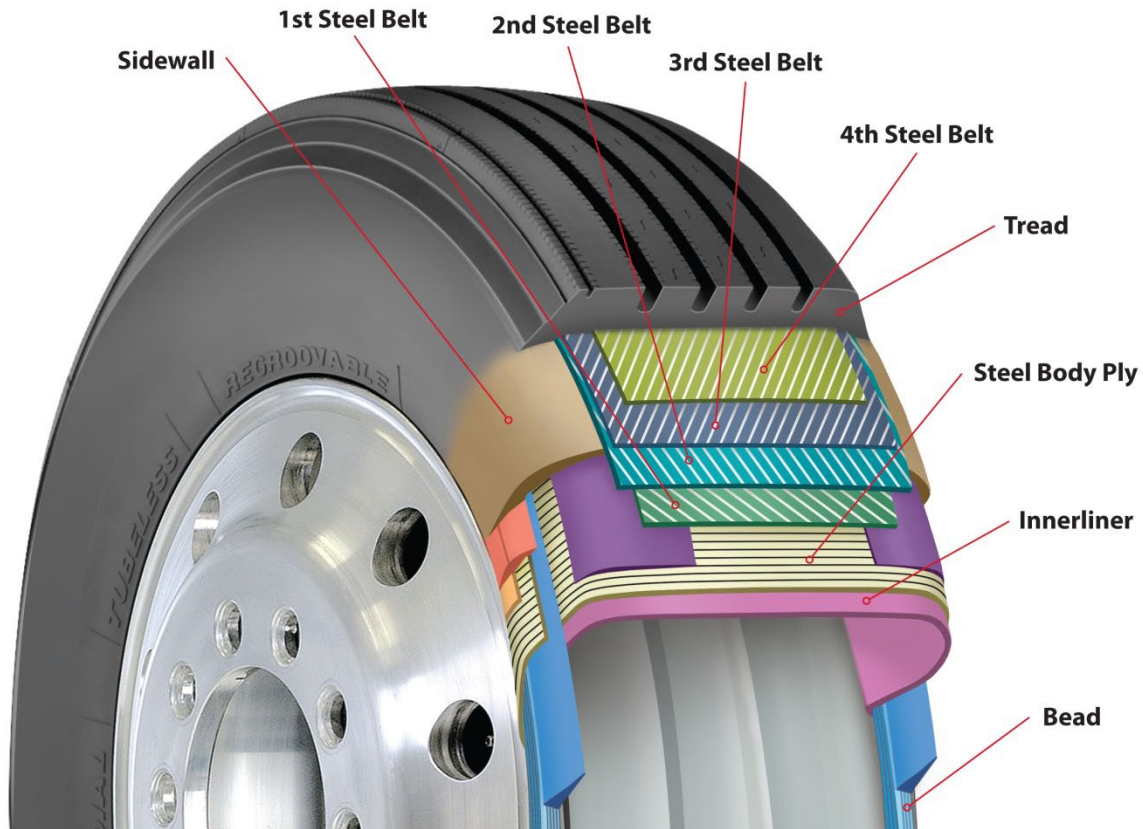
Radial steel body ply is placed straight across the tire from bead to bead to form the protective rib cage of the tire carcass. In addition, radial tires have steel belt plies which run circumferentially around the tire under the tread. They constrict the radial ply cords and stabilize the tread area. Bias/diagonal tires have multiple layers of fabric plies, each running in alternate diagonal directions from bead to bead to form a crisscross pattern. The tires may also have narrow plies under the tread, called breakers, with cords that lie in approximately the same direction as the body ply cords. Although bias ply tires may be produced by more fundamental processes than radial tires, bias ply tires' plies twist more as the tire rolls, creating friction and heat buildup at highway speeds which increase rolling resistance and decrease fuel economy. These factors lead to reduced mileage capabilities, accelerated tire wear, and increased risk of tire failure.⁴⁴ The type of construction can be determined by looking at the size designation molded on the tire's sidewall.⁴⁵

Truck and bus tires produced domestically or imported into the United States are predominately of tubeless steel belted radial ply construction design coined "all-steel radial tires" in the industry as illustrated in figure I-3.

⁴⁴ National Highway Traffic Safety Administration (NHTSA), "The Pneumatic Tire," 2005.

⁴⁵ Radial ply construction is identified by an "R" designation, compared to a "hyphen" for bias ply, e.g., a 10R20 radial ply tire compared to an 10-20 bias ply tire of equivalent size.

Figure I-3
Truck and bus tires: Radial tire construction features



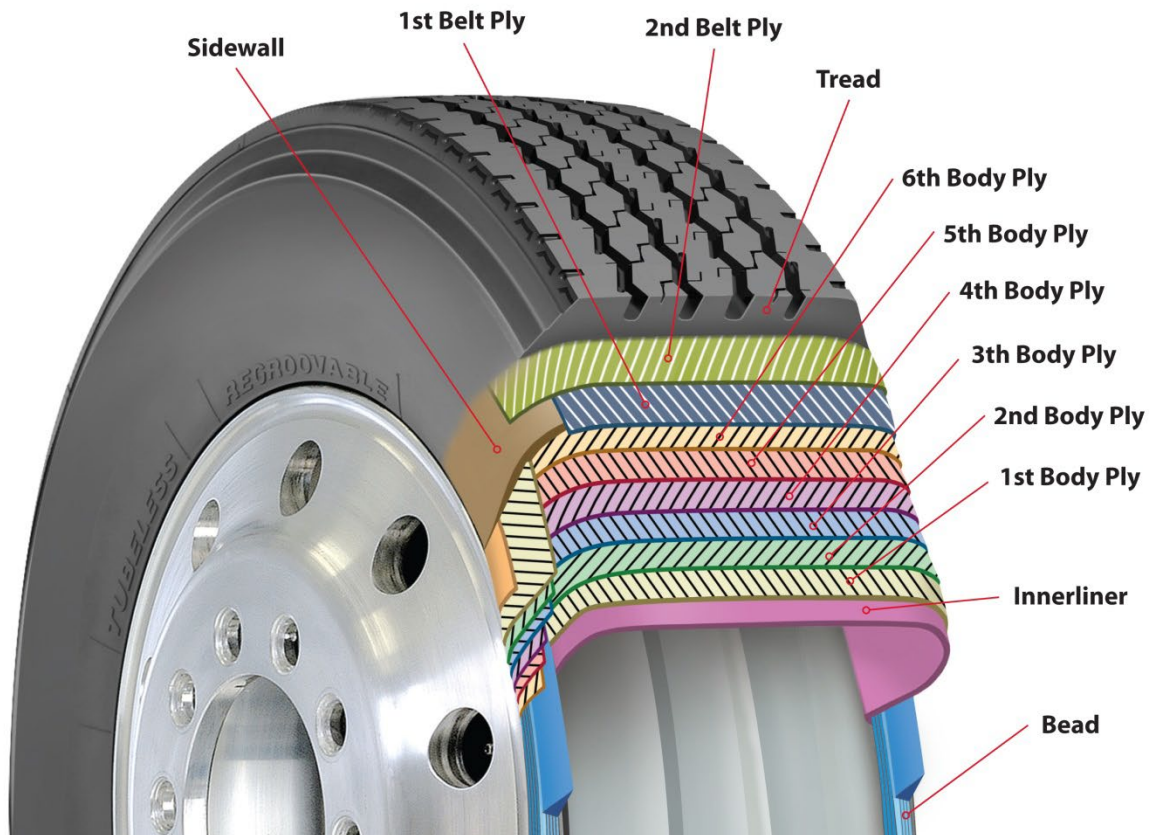
Source: "Truck Bus Care and Service information," U.S. Tire Manufacturers Association (USTMA).

The tire shown in figure I-3 is typical of an all-position steer tire with a relatively smooth rib type tread with deep grooves and mounted to a single piece wheel. Underneath the tread are four circumferential reinforcing steel belts and radial steel body ply cord which run straight across the tire from bead to bead. Also shown is the butyl rubber innerliner, which inhibits air loss to maintain constant tire air pressure, a key element of tubeless design. A heavy steel bead bundle design securely anchors the tire rim to the wheel to provide an airtight seal, superior strength, and stability necessary for extended heavy on-road and highway applications. Truck and bus tire sidewalls also contain heavy reinforcement designed to prevent sidewall damage.

A tubeless bias ply truck and bus tire of the type is shown in figure I-4.⁴⁶ Use of such tires is diminishing as improving road and highway conditions have reduced the need for bias tires to accommodate slower travel over rugged rural road conditions.⁴⁷

⁴⁶ USTMA graphics, 2016.

Figure I-4
Truck and bus tires: Bias ply tire construction features



Source: "Truck Bus Care and Service Information", USTMA.

Manufacturing processes

Truck and bus tire production technology is specialized, with a majority of production accomplished on dedicated equipment in separate U.S. plants by employees specifically trained for this purpose. Certain manufacturing technologies in new tire plants typically employ proprietary automated processes and quality control in the production of particular lines of truck and bus tires. Tire production employs a large variety of tire component compounds produced in conjunction with natural and synthetic rubber.

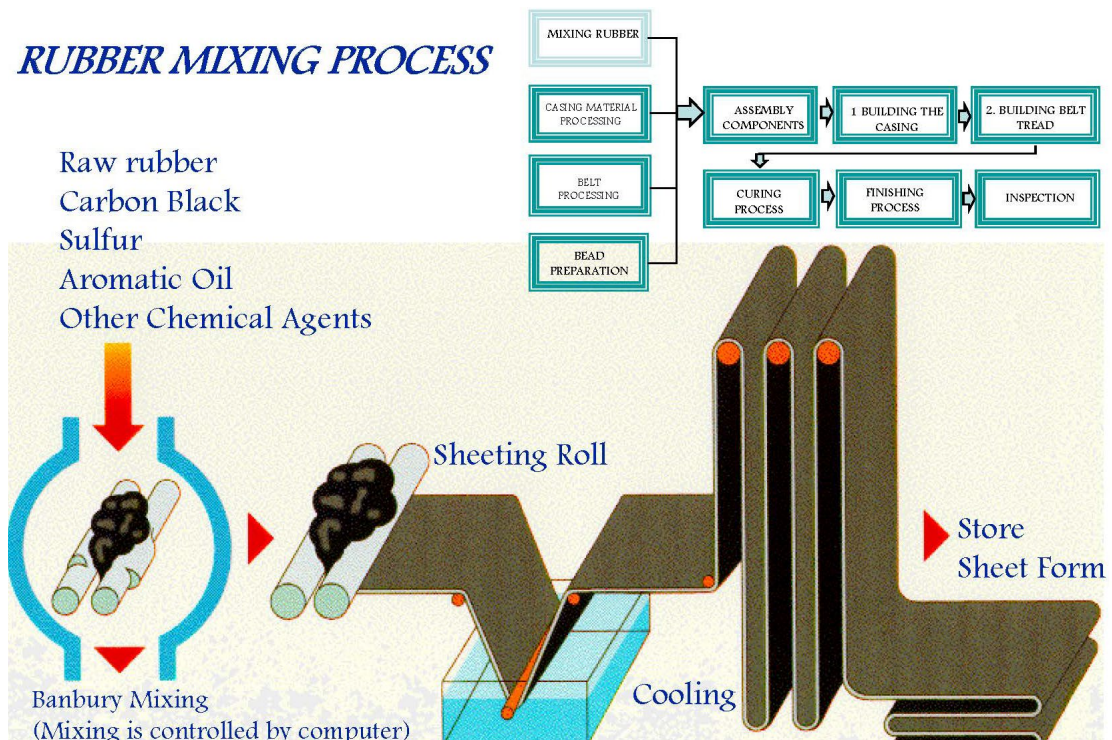
(...continued)

⁴⁷ U.S. Import volume of bias ply truck tires was reported as 524,000 tires in 2014, mostly from China, but total imports declined thereafter and by 2023, Thailand, China, and India, and new entry Vietnam, in order, accounted for the majority of the total 134,644 bias ply tires imported, less than 1.0 percent of all truck and bus tires imported. ITC DataWeb import trade data, HTS 4011.20.5020, September 6, 2024.

Several basic operations are required in the production of truck and bus tires, as shown: (1) formulation and mixing; (2) tire component processing; (3) tire component assembly (tire building); (4) tire curing (molding and vulcanization); and (5) finishing and inspection.

Initially, raw materials are received and undergo quality control testing. These materials include natural and synthetic rubbers, steel tire cord and steel fabric, carbon black reinforcing pigment, silica, steel wires for rim bead, and other processing chemicals, including antioxidants, plasticizers, sulfur curing agents, processing oils, and resins.

Figure I-5
Truck and bus tires: Process flow diagrams and rubber mixing process



Source: Truck and Bus Tires from Thailand, Investigation No. 731-TA-1658 (Preliminary), USITC Publication 5478, December 2023, p. I-16.

The base rubber batch formulation preparation stage involves the mixing of the various rubbers and selected raw materials into several different types of compounds or recipes designed for specific downstream process end uses, as shown in figure I-3. Each batch is placed into a Banbury mixer where the rubber is heated, softened, and mixed with the other ingredients under conditions of mixer blade shear and ram pressure. Following the discharge of a given rubber compound batch from the mixer, the mass is cooled, and sulfur curing agents are added. Subsequent Banbury mixing is usually required to complete this step.

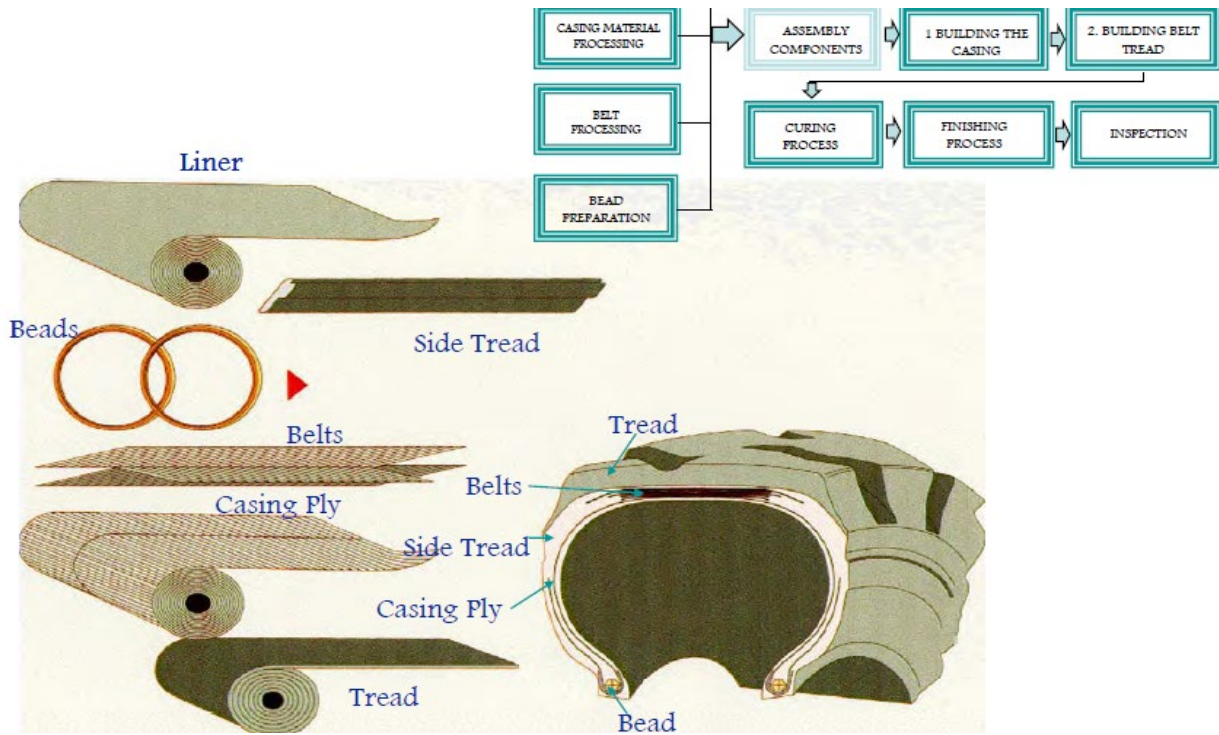
Several different types of equipment are used to process the rubber formulations into truck and bus tire components. Following milling of the various rubber recipes into thick sheets,

large machines equipped with rollers known as calendars produce sheets of butyl rubber interlining which prevent the migration of pressurized air through the tubeless tire casings. Calendars also coat tire cord fabric or wire with selected rubber formulations for reinforcement of the tire casing which supports the weight of the vehicle.

Machines called wire winders apply a given rubber batch coating to the bead wire and wrap it into an exact circular dimension needed to hold the tubeless tire securely to a given steel wheel. The smooth rubber pieces that will eventually become treads and sidewalls are produced with extruders which force various softened rubber compounds of synthetic rubbers and natural rubber through a die to produce the desired configurations. The tread and sidewall rubbers typically consist of mixtures of the synthetic rubbers styrene-butadiene ("SBR") and butadiene rubber ("BR") in combination with natural rubber ("NR").

The multiple components that are processed into rubberized assembly elements in preparation for the tire building process are shown in figure I-6.

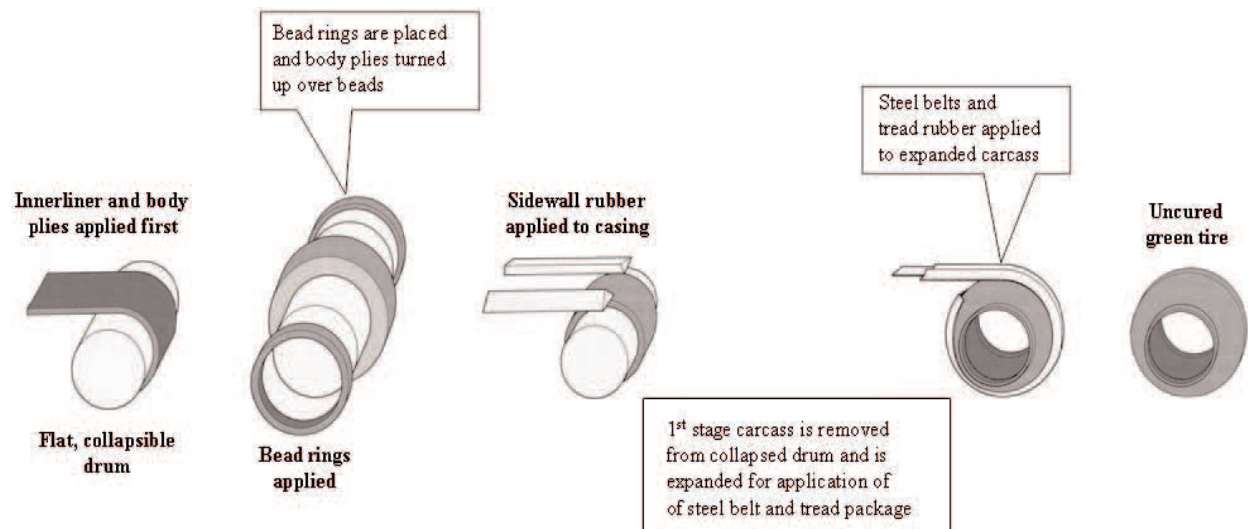
Figure I-6
Truck and bus tires: Tire assembly components



Source: Truck and Bus Tires from Thailand, Investigation Nos. 731-TA-1658 (Preliminary), USITC Publication 5478, December 2023, p. I-17.

Next, the individual components identified above are sequentially assembled by employees in a circular fashion about horizontally positioned cylindrical tire building drums to create a green (uncured) tire structure. Although the fundamentals of building commercial truck and bus radial tires are similar to that of consumer passenger and light truck tires in many respects, commercial tire equipment is larger and more robust and more typically completed in one building stage, while consumer radial tire building may proceed in two stages as shown in figure I-7. Vendors have devised automated tire assembly equipment that combines several assembly steps or links them into a continuous process.

Figure I-7
Truck and bus tires: Tire assembly process



Source: National Highway Traffic Safety Administration (NHTSA). "The Pneumatic Tire," 2005

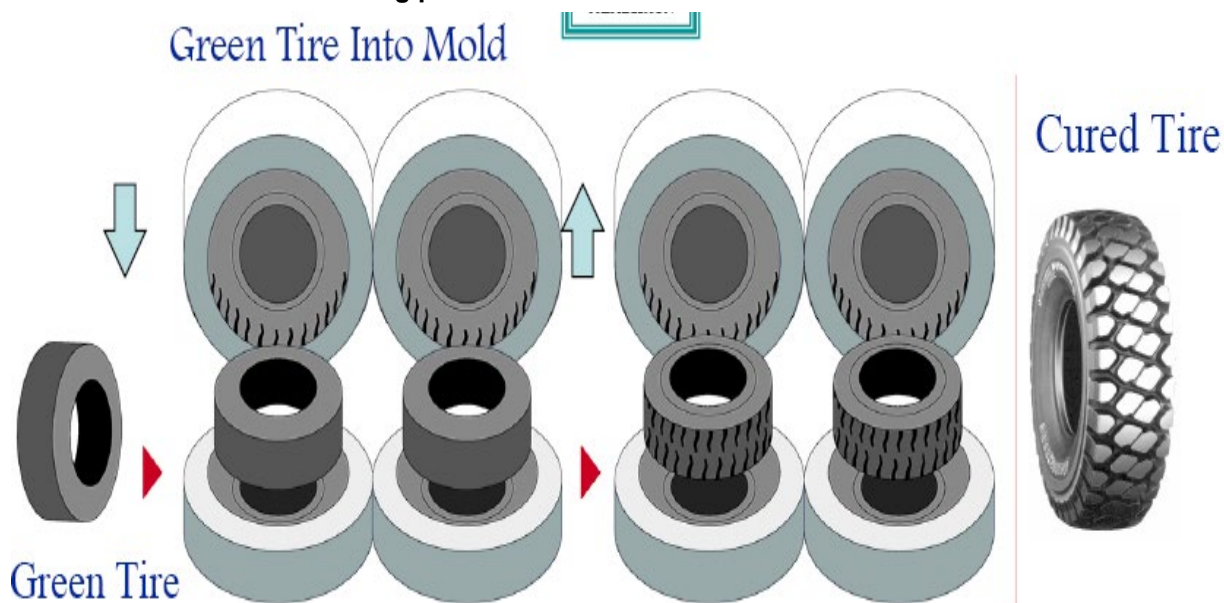
Radial ply construction begins by first placing an air impervious butyl rubber innerliner about the drum, followed by the placement of parallel steel or fabric body plies, bead rings and sidewall rubber about the drum circumference that will run “radially” from bead to bead to the direction of travel. In bias ply tire building, the tire cord reinforcement plies are placed at alternating angles around the drum circumference as the assembly proceeds so its configuration in the finished tire will result in a crisscross herringbone reinforcement pattern running from bead to bead at angles to the direction of travel. In commercial radial truck and bus tire manufacture, after all components have been placed around the drum, pressurized air is injected into the center tire casing bladder to expand the assembly, followed by formation of the final tire configuration effected by the introduction of inflated devices on each side of the assembly which push in the sidewall tire components into the final green tire structure.⁴⁸ Passenger and light truck tire building is usually completed on a second inflatable drum as shown.

The final molding and curing process involves the placement of the green tire assembly about a bladder sleeve in a circular curing press tire mold of the appropriate configuration as shown in figure I-8. After the curing press is closed, the bladder is injected with steam and

⁴⁸ “Bridgestone truck tire production process,” <https://www.youtube.com/watch?v=wA0dX-phO2Q> , retrieved August 2024. See also USTMA, “How Tires are Made,” <https://www.youtube.com/watch?v=cuMnOaah7Sk>, retrieved June 2024.

expanded to force the green tire assembly out against the mold walls. The green tire thus takes on the configuration of the model-specific tire mold, including that of the sidewall and tread, together with multiple sidewall designations. Vulcanization or curing of the green tire takes place in the mold at elevated temperature and pressure. During vulcanization, the original weak green tire rubber becomes strong, durable nature (thermoset), and will not again soften with heat due to molecular cross-linking or bonding of the rubber with the sulfur chemical additives.⁴⁹ Curing times vary depending upon the size and design of the tire.⁵⁰

Figure I-8
Truck and bus tires: Tire curing process



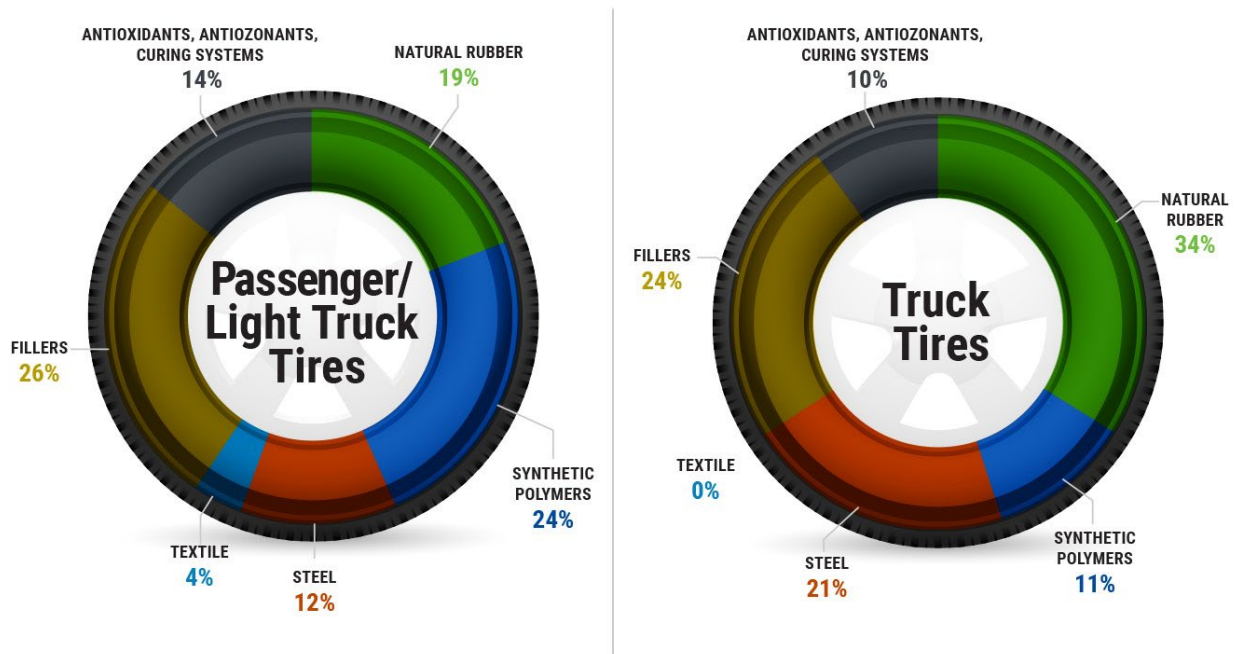
Source: Truck and Bus Tires from Thailand, Investigation Nos. 731-TA-1658 (Preliminary), USITC Publication 5478, December 2023, p. I-19.

Following the molding and curing process, it is generally standard practice in the tire industry to forward the finished tire to the quality control area for a final visual and x-ray inspection. The tires that pass inspection are then moved to a warehouse for storage and shipping. Finished, unmounted tires are coded for tracking, and to identify the plant of manufacture and other information. The material compositions of finished commercial truck-bus and consumer passenger vehicle-light truck tires are shown in figure I-9.

⁴⁹ Certain Off-The-Road Tires from China, Investigation Nos. 701-TA-448 and 731-TA-1117 (Review), USITC Publication 4448, January 2014, pp. I-14; 15.

⁵⁰ The size, weight, and scale of heavier truck and bus tires like steer tires require additional curing time. Conference transcript, p. 42 (Juarez).

Figure I-9
Truck and bus tires: Material compositions of finished tires



Source: U.S. Tire Manufacturers Association (USTMA).

Commercial truck and bus tire material composition is characterized by the high degree of steel reinforcement and natural rubber contents, key materials requirements for the versatile combination of strength and mobility necessary to support heavily loaded commercial vehicles whether used in long-haul highway service, or in regional or local settings.

Domestic like product issues

No issues with respect to the domestic like product have been raised in this investigation. In the preliminary phase of this investigation, the petitioner proposed that the Commission define a single domestic like product coextensive with the scope.⁵¹ No respondent party objected to Petitioner's proposed definition of the domestic like product in the preliminary phase of this investigation.⁵² The Commission defined a single domestic like product, coextensive with the scope.⁵³ In the final phase of this investigation, no parties requested data or other information necessary for the analysis of the domestic like product in their comments on draft questionnaires.

⁵¹ Petitioner's postconference brief, p. 2.

⁵² Conference transcript, p. 108 (Colarusso).

⁵³ Truck and Bus Tires from Thailand, Investigation No. 731-TA-1658 (Preliminary), USITC Publication 5478, December 2023, p. 8.

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

U.S. market characteristics

Truck and bus tires are pneumatic tires designated for vehicles with a given vehicle weight of 10,000 pounds or more.¹ Truck and bus tires, as described in Part I of this report, are sold in four categories: steer, drive, trailer, and all position.² Truck and bus tires are sold both to original equipment manufacturers (“OEMs”) and in aftermarket sales. Truck and bus tires are also sold as private label or brand label tires³ and often with retreading warranties.

Two of 5 responding U.S. producers, 11 of 29 importers, and 11 of 25 purchasers indicated that the market was subject to distinctive conditions of competition. A number of the firms reported conditions of competition that influenced the market, including:

- COVID-19 constrained OEM production, reducing demand for truck and bus tires in the OEM market but increasing demand in the aftermarket;
- COVID-19 limited the production of retreads; this increased the use of alternate brands and lower tiered products;
- During the COVID-19 pandemic the trend was for purchasers to buy less expensive tires;
- Customer consolidation has increased customers’ pricing power;
- New product sizes have been introduced;
- Product changes have improved tire performance;
- Tires are sold in tiers with different tiers usually having specific buyers and producers;
- Competition has increased in the truck and bus tire market; and
- Demand is seasonal.

¹ Bridgestone Truck Tire Data Book 2022, “Truck Types by Weight Class,” p. 90.

² Steer tires are designed to be used on the front axle to aid with steering. Drive tires are designed exclusively for the torque axles (in the middle of the vehicle) and provide better traction. Trailer tires are designed for use on the last or trailer axles. See Part I, p. I-11.

³ ***. See Part III and Part IV for details.

COVID-19 pandemic

Firms were specifically asked if the COVID-19 pandemic and the responses to it had influenced their arrangements. Four of 7 producers, 16 of 31 importers, and 14 of 26 purchasers reported that the COVID-19 pandemic had influenced their arrangements. Among the most important of these included:

- Shortages (back orders, temporary factory shutdowns both in the United States and the rest of the world, high employee turnover and absenteeism);
- Swings in supply and demand (that led to longer lead times, excessive orders in response to the backlog, once the delays ended purchasers had high inventories);
- Increased costs (shipping costs, raw material costs, tire prices);
- Logistic difficulties;
- Difficult for smaller retailers to compete against larger retailers because the larger retailers purchased all available product;
- Retailers needed multiple sources to have adequate supply; and
- Some retailers lost employees.

Apparent U.S. consumption of truck and bus tires in the United States, by quantity, fluctuated, increasing by 20.9 percent from 2021 to 2022, then declining by 21.8 percent from 2022 to 2023, resulting in a net decrease of 5.4 percent from 2021 to 2023. Apparent U.S. consumption by quantity was 12.4 percent higher in January-June 2024 than in January-June 2023.

U.S. purchasers

The Commission received 26 usable questionnaire responses from firms that had purchased truck and bus tires during January 2021-June 2024.^{4 5} Of the 26 responding purchasers, 17 purchased the domestic truck and bus tires, 22 purchased from Thailand, 18 purchased from nonsubject sources, and 10 purchased from unknown sources. Nineteen responding purchasers are aftermarket distributors, seven are OEM end users, and three are other (including an OEM sub assembler, and two distributors that were also retailers). Large purchasers of truck and bus tires were ***.

⁴ The following firms provided purchaser questionnaire responses: ***.

⁵ Twenty-five purchasers indicated they had marketing/pricing knowledge of domestically produced truck and bus tires, 23 of truck and bus tires produced in Thailand, and 25 of truck and bus tires produced in at least one nonsubject country (Canada (9), China (20), Japan (15), South Korea (17), Vietnam (16), and other (15)).

Impact of section 301 tariffs

Most U.S. producers (4 of 5 responding), importers (20 of 23), and purchasers (12 of 16) reported that section 301 tariffs had an impact.⁶ The impacts reported included:

- Reduced imports and temporary shortages (Chinese supply dried up, the value segment of the market was not supplied, domestic suppliers were not interested in the value section leaving this section with a short supply);
- Higher prices (for all tires in all tiers);
- Increased purchases of U.S.-produced tires;
- Favorable U.S. investment decisions; and
- Suppliers from other countries began entering the U.S. market.

Channels of distribution

U.S.-produced and imported truck and bus tires from producers in Thailand and nonsubject sources are sold mainly to aftermarket suppliers, as shown in table II-1. Imports from Thailand were less prevalent in OEM sales, however, Thailand’s share of OEM sales increased during the period for which data were collected.

Table II-1
Truck and bus tires: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	OEM	29.3	31.0	35.0	36.8	38.2
United States	Aftermarket	70.7	69.0	65.0	63.2	61.8
Thailand	OEM	8.3	7.6	12.1	12.4	13.2
Thailand	Aftermarket	91.7	92.4	87.9	87.6	86.8
Nonsubject	OEM	24.2	24.8	26.8	29.9	24.4
Nonsubject	Aftermarket	75.8	75.2	73.2	70.1	75.6
All imports	OEM	16.6	16.8	20.5	22.7	19.8
All imports	Aftermarket	83.4	83.2	79.5	77.3	80.2

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

⁶ One producer, nine importers, and nine purchasers reported that they did not know the impact of the section 301 tariffs.

Geographic distribution

U.S. producers and importers of truck and bus tires from Thailand reported selling truck and bus tires to all regions in the contiguous United States (table II-2). For U.S. producers, 12.4 percent of sales were within 100 miles of their production facility, 61.5 percent were between 101 and 1,000 miles, and 26.1 percent were over 1,000 miles. Importers of truck and bus tires produced in Thailand sold 28.7 percent within 100 miles of their U.S. point of shipment, 51.2 percent between 101 and 1,000 miles, and 20.0 percent over 1,000 miles.

Table II-2
Truck and bus tires: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	Thailand
Northeast	5	18
Midwest	5	24
Southeast	6	19
Central Southwest	5	24
Mountain	4	20
Pacific Coast	5	23
Other	4	13
All regions (except other)	4	16
Reporting firms	6	25

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

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table II-3 provides a summary of the supply factors regarding truck and bus tires from U.S. producers and from Thailand.

Table II-3
Truck and bus tires: Supply factors that affect the ability to increase shipments to the U.S. market, by source

Quantity in 1,000 units; ratio and share in percent; count in number of firms reporting

Factor	Measure	United States	Thailand
Capacity 2021	Quantity	15,377	***
Capacity 2023	Quantity	14,599	11,724
Capacity utilization 2021	Ratio	88.5	***
Capacity utilization 2023	Ratio	86.9	69.1
Inventories to total shipments 2021	Ratio	14.4	***
Inventories to total shipments 2023	Ratio	29.4	7.5
Home market shipments 2021	Share	92.4	***
Non-US export market shipments 2023	Share	7.6	42.8
Ability to shift production (firms reporting "yes")	Count	***	***

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

Note: Responding U.S. producers accounted for virtually all of U.S. production of truck and bus tires in 2023. Responding foreign producer/exporter firms accounted for more than half of U.S. imports of truck and bus tires from producers in Thailand during 2023. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from Thailand, please refer to Part I, "Summary Data and Data Sources."

Domestic production

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

Both capacity and production decreased between 2021 and 2023, but production decreased more than capacity. Major export markets included Canada and Mexico. Producers reported producing other tires on the same equipment as truck and bus tires including tires for use in ***. Factors affecting U.S. producers' ability to shift production include: ***. Most U.S. producers reported supply constraints in 2021 (when capacity utilization was 88.5 percent) and 2022 (capacity utilization of 90.0 percent) but reported no capacity constraints in 2023 (capacity utilization of 86.9 percent). Supply constraints are discussed in detail later.

Imports from Thailand

Based on available information, the producers of truck and bus tires from Thailand have the ability to respond to changes in demand with large changes in the quantity of shipments of truck and bus tires to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity, ability to shift shipments from alternate markets, and the ability to shift production to or from alternate products. The factor mitigating responsiveness of supply is the limited inventories.

Capacity increased while production decreased between 2021 and 2023. Export markets reported include Asia (India, Japan, Malaysia, Philippines, Vietnam, Southeast Asia), Europe (Germany, Italy, Poland, UK) and the Middle East (Egypt). The only barrier to shifting between markets reported was Egyptian duties on truck and bus tires.⁷ Other products that responding foreign producers reportedly can produce on the same equipment as truck and bus tires are ***. Factors affecting foreign producers' ability to shift production include labor skills and machine specifications.

Imports from nonsubject sources

Imports from nonsubject countries accounted for 59.5 percent of total U.S. imports of truck and bus tires (by quantity) in 2023. The largest sources of nonsubject imports during January 2021-June 2024 were Vietnam, Japan, China, Canada, and South Korea. In 2023, these countries combined accounted for 77.7 percent of nonsubject imports by quantity.

Supply constraints

Most of the responding U.S. producers reported that they had experienced supply constraints in 2021 and 2022 (table II-4).⁸ In contrast, most of the responding importers and the responding purchasers reported that they had not experienced supply constraints in any period since January 1, 2021. Purchasers, however, reported that U.S. producers had supply constraints much more frequently than foreign sources.

⁷ A case for the Indian market was reported to be terminated.

⁸ ***.

**Table II-4
Truck and bus tires: Number of firms reporting supply constraints by period**

Year	2021	2022	2023 up to October 17	After October 17, 2023
Producers reporting supply constraint	***	***	***	***
Total producers responding	5	5	5	5
Importers reporting supply constraint	13	13	4	3
Total importers responding	31	31	30	30
Purchasers reporting domestic supply constraint	11	11	8	6
Purchasers reporting foreign supply constraint	6	6	4	4
Total purchasers responding	25	25	24	25

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

Reasons that producers reported for shortages were a spike in demand, and the need to ramp up production after the COVID-19 reduction in production. Reasons that importers reported for supply constraints since 2021 include: the need to ramp up production after the COVID-19 lockdowns (reduced production due to COVID-19); shipment delays; and freight surcharges on imports making them unaffordable. In addition, purchasers reported U.S. producers (Bridgestone Americas, Continental Tire, Goodyear, Michelin NA, and Yokohama Tire) had limited, rejected, or canceled purchasers' orders, or provided less than was ordered. Purchasers also reported that domestic producers' supply was not available to them because it was committed to OEMs and large fleets and that major manufactures limit the distributors they sell to. Regarding imports, purchasers reported being on allocation from all suppliers, imports being unavailable because of supply chain issues, and importers using controlled order entry.

Purchasers were asked specifically about the importance of COVID-19 delays. Most purchasers (15 of 25 responding) reported that delays caused by the COVID-19 pandemic were very important, 4 reported that delays were somewhat important, 4 reported that these were not important, and two reported no delays. Purchasers were asked if U.S.-produced truck and bus tires were more or less likely to be delayed than those from Thailand in the OEM and aftermarket. In the OEM market, half the firms reporting delays (5 of 10)⁹ reported that the delays for U.S. and Thai product were similar, 3 reported U.S. delays were greater, and 2 reported that Thai delays were greater. In the aftermarket, in contrast, 10 of 21¹⁰ responding purchasers reported that delays for truck and bus tires imported from Thailand were greater than those of U.S.-produced truck and bus tires, 3 reported that U.S. delays were greater than those for Thai product, and 7 reported that the delays were the same.

⁹ This total includes only the firms that reported delays in the OEM market, as 12 firms reported that they did not purchase in the OEM market and 1 firm in the OEM market reported no delays.

¹⁰ Four purchasers reported no purchases in the aftermarket and are not included in the total.

New suppliers

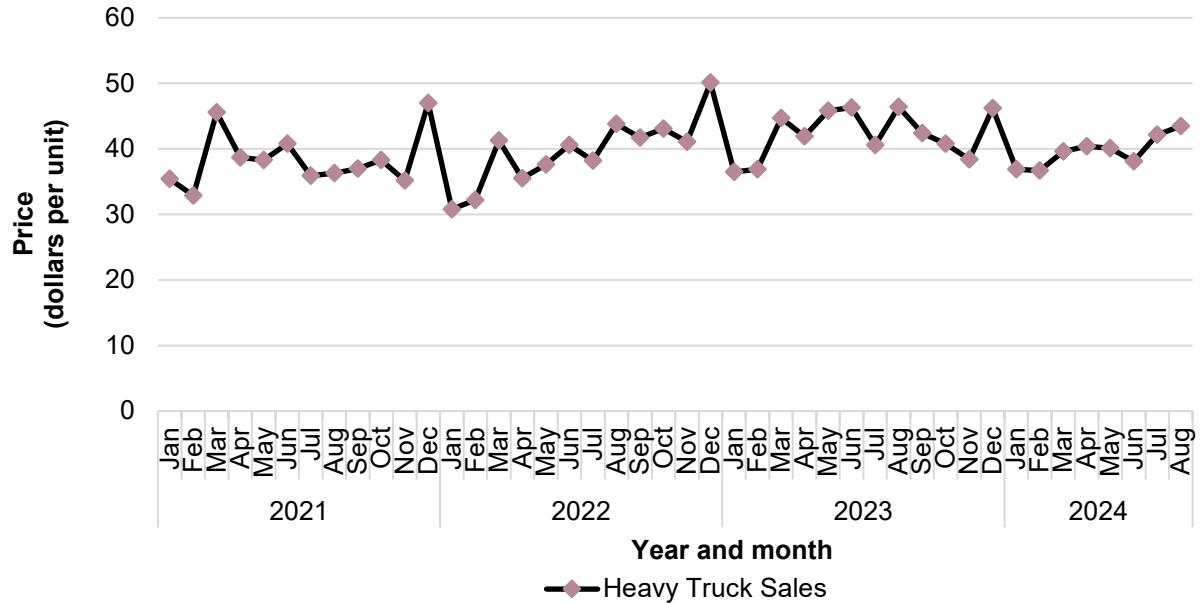
Eleven of 25 responding purchasers indicated that new suppliers entered the U.S. market since January 1, 2021. Purchasers cited Apollo (India), Fortune, Magna, Maxam, Pirelli, and Ralson as new suppliers.

U.S. demand

Based on available information, the overall demand for truck and bus tires is likely to experience small changes in response to changes in price. The main contributing factors are the lack of substitute products and the small cost share of truck and bus tires in the cost of a new truck or bus.

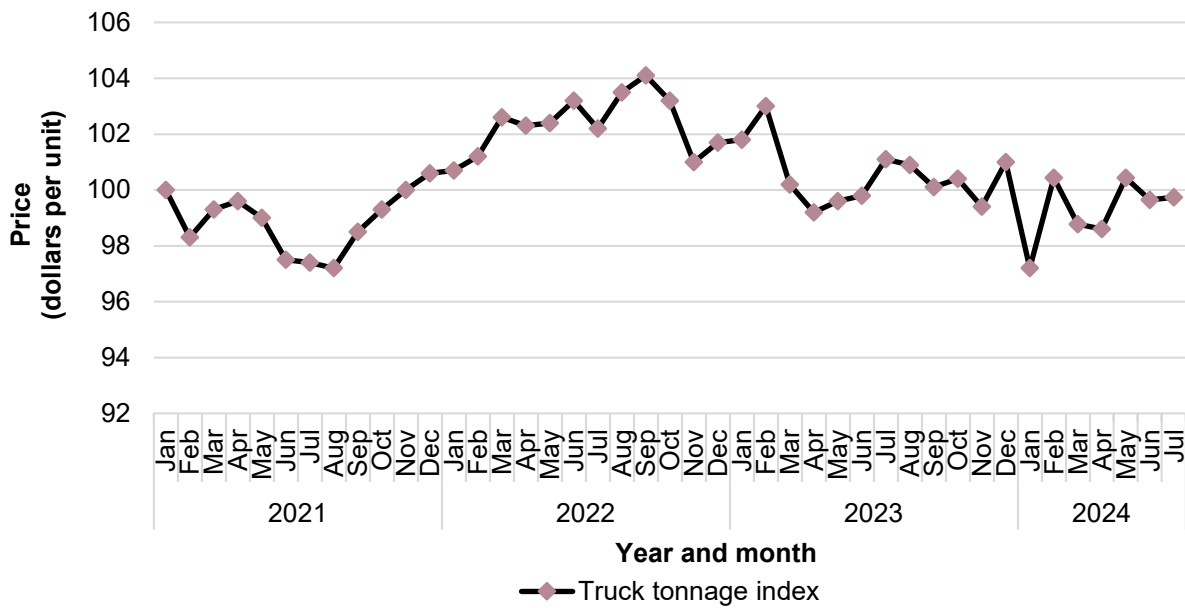
Overall demand for truck and bus tires is driven by the demand for trucking in the United States. Demand for OEM truck and bus tires is driven by heavy truck and trailer sales. U.S. heavy truck sales fluctuated with its lowest value in January 2022 and its peak in December 2022. Overall sales of heavy trucks were 9.8 percent higher in 2023 than they had been in 2021 (figure II-1 and table II-6). Demand for aftermarket truck and bus tires is driven by truck tonnage and mileage. Truck tonnage was lowest in August 2021 and remained below January 2021 levels from February 2021 to October 2021, peaked in September 2022 and then declined to close to its initial value from March 2023 to March 2024 (figure II-2 and table II-5).

Figure II-1
Heavy trucks: U.S. heavy truck sales (not seasonally adjusted), January 2021-August 2024



Source: <https://fred.stlouisfed.org/series/HTRUCKSNSA>, retrieved September 27, 2024.

Figure II-2
Heavy trucks: Seasonally adjusted truck tonnage index, January 2021-July 2024



Source: <https://fred.stlouisfed.org/series/TRUCKD11>, retrieved September 27, 2024.

Table II-5**Truck and bus tires: U.S. heavy truck sales (in 1,000 trucks) not seasonally-adjusted January 2021 to August 2024**

Month	2021	2022	2023	2024
January	35.4	30.8	36.5	36.9
February	32.9	32.2	36.9	36.7
March	45.6	41.3	44.7	39.6
April	38.7	35.5	41.9	40.4
May	38.3	37.6	45.8	40.1
June	40.8	40.6	46.3	38.1
July	35.9	38.2	40.6	42.2
August	36.3	43.8	46.4	43.5
September	37.0	41.7	42.4	NA
October	38.3	43.1	40.8	NA
November	35.2	41.1	38.4	NA
December	47.0	50.1	46.2	NA

Source: <https://fred.stlouisfed.org/series/HTRUCKSNSA>, retrieved September 27, 2024.**Table II-6****Truck and bus tires: U.S. seasonally-adjusted truck tonnage index January 2021 to July 2024**

Month	2021	2022	2023	2024
January	100.0	100.7	101.8	97.2
February	98.3	101.2	103.0	100.9
March	99.3	102.6	100.2	98.9
April	99.6	102.3	99.2	98.6
May	99.0	102.4	99.6	100.4
June	97.5	103.2	99.8	99.6
July	97.4	102.2	101.1	99.7
August	97.2	103.5	100.9	NA
September	98.5	104.1	100.1	NA
October	99.3	103.2	100.4	NA
November	100.0	101.0	99.4	NA
December	100.6	101.7	101.0	NA

Source: <https://fred.stlouisfed.org/series/TRUCKD11>, retrieved September 27, 2024.**End uses and cost share**

U.S. demand for truck and bus tires depends on U.S.-produced new trucks and buses and the need for replacement tires for trucks and buses. Truck and bus tires account for a small share (most firms estimated 2 to 5 percent) of the cost of new trucks or buses but a broad range of the share of the cost for replacement tires (estimated 5 to 30 percent).

Business cycles

All 5 responding U.S. producers, 21 of 30 importers, and 19 of 25 purchasers indicated that the market was subject to business cycles. Specifically, business cycles reported included: hotter weather increases the frequency of tire replacement; demand reflects overall economic activity (increased miles driven increases tire demand); demand is seasonal (different firms report different months but overall, demand tends to be higher in March to October); demand in the replacement market is more consistent than OEM demand; and disruptions from COVID-19 ended in 2023.

Demand trends

Most firms reported that overall U.S. demand for truck and bus tires either increased or was unchanged since January 1, 2021 (table II-7).

Table II-7
Truck and bus tires: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Market	Firm type	Increase steadily	Increase with fluctuation	No change	Decrease with fluctuation	Decrease steadily
Overall domestic demand	U.S. producers	2	1	2	0	0
Overall domestic demand	Importers	2	5	7	4	1
Overall domestic demand	Purchasers	4	2	5	3	1
OEM domestic demand	U.S. producers	1	2	3	1	0
OEM domestic demand	Importers	1	2	6	4	0
OEM domestic demand	Purchasers	5	2	1	4	1
Aftermarket domestic demand	U.S. producers	2	1	2	0	0
Aftermarket domestic demand	Importers	2	5	7	4	1
Aftermarket domestic demand	Purchasers	4	2	5	3	1
Overall foreign demand	U.S. producers	0	1	2	1	1
Overall foreign demand	Importers	0	2	6	3	1
Overall foreign demand	Purchasers	0	2	0	1	1

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

Substitute products

All 6 responding U.S. producers, all 30 responding importers, and 22 of the 25 responding purchasers reported that there were no substitutes for truck and bus tires. The only substitute for truck and bus tires reported was retread tires (usable in the drive and trailer positions). All three purchasers reporting substitutes reported that they did not influence the price of tires.

Substitutability issues

This section assesses the degree to which U.S.-produced truck and bus tires and imports of truck and bus tires from Thailand can be substituted for one another by examining the importance of certain purchasing factors and the comparability of truck and bus tires from domestic and imported sources based on those factors. The degree of substitution between domestic and imported truck and bus tires depends upon such factors as relative prices, quality (e.g., grade standards, reliability of supply, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, payment terms, product services, etc.).

Based on available data, staff believes that there is a moderate to high degree of substitutability between domestically produced truck and bus tires and truck and bus tires imported from Thailand.¹¹ Tire quality/performance and service are important purchase criteria. Factors contributing to high interchangeability include the overlap in quality and services ***. Factors mitigating interchangeability are the perceived differences in quality and differences in services between U.S. producers and most imports from Thailand.

Truck and bus tires are sold into tiers with higher tiers of truck and bus tires having a reputation for higher quality/performance and services. Higher tiers are also more likely to be sold to OEM purchasers. U.S. producers reported selling 81.1 percent of their truck and bus tires in tier 1, 16.5 percent in tier 2, 2.4 percent in tier 3 and no reported sales in tiers 4 and 5. In contrast, importers reported *** percent of imports from Thailand to be sold in tier 1,¹² *** percent in tier 2,¹³ 31.6 percent in tier 3,¹⁴ 34.0 in tier 4, and *** percent in tier 5. Thus, approximately two-thirds of truck and bus tires from Thailand were considered were below tier 2, contrasted with few (tier 3) or no (tiers 4 and 5) U.S.-produced truck and bus tires.

¹¹ The degree of substitution between domestic and imported truck and bus tires depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced truck and bus tires to the truck and bus tires from Thailand (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

¹² Most of the imports from Thailand that were reported to be in tier 1 ***.

¹³ Some of the imports from Thailand that were reported to be in tier 2 ***.

¹⁴ Few of the imports from Thailand that were reported to be in tier 3 ***.

Most firms report that there are quality differences between truck and bus tires in the highest and lowest tiers. Thus, for many of the purchasers there are differences between some U.S.-produced and imported tires as reflected in the tiers. On the other hand, ***¹⁵ and ***¹⁶ import truck and bus tires from Thailand. *** truck and bus tires. These tier 1 imports, particularly those produced in Thailand by ***, may be highly substitutable with U.S.-produced truck and bus tires, while Thai imports that typically are reported to be tiers 3 and 4 may be less substitutable.

¹⁵ ***. There were ***. ***. ***. Thus, it appears imports produced by *** tend to be highly interchangeable with U.S.-produced truck and bus tires in tier 1.

¹⁶ ***.

Factors affecting purchasing decisions

Purchaser decisions based on source

As shown in table II-8, most purchasers either usually or never make purchasing decisions based on the producer. In contrast, most purchasers report that their customers usually or sometimes make purchasing decisions based on the producer. Most purchasers and their customers sometimes or never make purchasing decisions based on the country of origin. However, only one fewer purchaser always or usually made purchase decisions based on the producer as sometimes or never. Reasons that purchasers or their customers always or usually make decisions based on the manufacturer included: use of strategic suppliers (partnership with a number of suppliers); purchase from producers that have a reputation for quality/reliability; multi-brand strategy in order to cover all market segments; and brands are important. Firms which always or usually purchase based on country of origin reported that they did this because they wanted long term relationships, because of potential tariffs, and to comply with USMCA requirements.

Table II-8
Truck and bus tires: Count of purchasers' responses regarding frequency of purchasing decisions based on producer, country of origin, and brand

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	4	8	5	8
Customer	Producer	1	7	10	5
Purchaser	Country	1	5	5	13
Customer	Country	1	3	9	9

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

Importance of purchasing domestic product

Twenty-two of 25 responding purchasers reported that 80 percent or more of their purchases did not require purchasing U.S.-produced product. Most purchasers (16) reported that all of their purchases did not require purchasing U.S.-produced product. Five reported that domestic product was required by law (for 0.5 to 10 percent of their purchases), nine reported it was required by their customers (for 0.5 to 90 percent of their purchases), and none reported other preferences for domestic product.

Most important purchase factors

The most often cited top three factors that firms consider in their purchasing decisions for truck and bus tires were quality (18 firms), price (16 firms), and availability (12 firms) as shown in table II-9. Price was the most frequently cited first-most important factor (cited by 7 firms), followed by quality (6 firms); quality was the most frequently reported second-most important factor (6 firms); and quality was the most frequently reported third-most important factor (6 firms).

Table II-9
Truck and bus tires: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Quality	6	6	6	18
Price	7	4	5	16
Availability	4	5	3	12
Relationship with the supplier	2	4	0	6
Brand	2	0	2	4
Product range	1	0	3	4
Customer choice	2	0	1	3
Territory	1	1	1	3
Value	1	1	0	2
Delivery/lead time	0	1	1	2
All other factors	1	3	3	7

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

Note: Other factors include for first factor: ***; for second factor: ply ratings, producer's capacity, and physical characteristics of the tire; and for third factor: the track record of the producer; ability to make a profit selling the product, and warranty and field support.

Note: two purchasers more than one of the factors as first and third factor. One reported price, availability, and territory as first factor and one reported price and availability as third factor. All these responses are included in the table.

The majority of purchasers (13 of 23) reported that they sometimes purchase the lowest-priced product. Two reported that they always, four reported usually, and four reported they never purchase the lowest-priced truck and bus tires.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 21 factors in their purchasing decisions (table II-10). The factors rated as very important by more than half of responding purchasers were availability (25 purchasers), reliability of supply and safety (22 each), product consistency (21), quality meets industry standards (20), price (18), and delivery time (15). Factors that most responding purchasers reported as not important were packaging (reported as not important by 21 purchasers), sold under contract along with services (15), and minimum quantity requirement (13).

Table II-10
Truck and bus tires: Count of purchasers' responses regarding importance of purchase factors, by factor

Factor	Very important	Somewhat important	Not important
Availability	25	0	0
Delivery terms	11	13	1
Delivery time	15	10	0
Discounts offered	7	16	2
Durability/wear resistance	10	15	0
Fuel efficiency	6	15	4
Major brand	9	12	4
Minimum quantity requirements	3	9	13
Packaging	0	4	21
Payment terms	8	15	2
Price	18	7	0
Product consistency	21	3	1
Product range	9	12	4
Quality exceeds industry standards	5	16	4
Quality meets industry standards	20	3	2
Reliability of supply	22	2	1
Retreadability	8	13	4
Safety	22	3	0
Sold under contract along with services	2	8	15
Technical support/service/warranty	10	13	2
U.S. transportation costs	7	13	5

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

Lead times

Truck and bus tires are primarily sold from inventories. U.S. producers sold most of their commercial shipments from inventories, with average lead times declining slightly between 2021 and 2023 (table II-11). Importers reported that nearly half of their commercial shipments were from U.S. inventories, with average lead times averaging either 7 or 8 days.

Table II-11

Truck and bus tires: Producers' and importers' reported shares and time to delivery for produced to order, sold from U.S. inventories, and sold from inventories overseas by year

Share in percent, time in days

Source	Year	Produced to order share	Produced to order time	From U.S. inventories share	From U.S. inventories time	Foreign inventories share	Foreign inventories share
U.S. producer	2021	7.8	42	92.2	13	NA	NA
U.S. producer	2022	9.2	41	90.8	11	NA	NA
U.S. producer	2023	10.3	39	89.7	11	NA	NA
Imports	2021	47.3	104	30.9	6	21.8	92
Imports	2022	50.2	107	32.3	8	17.5	114
Imports	2023	39.0	102	38.6	9	22.4	88

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

Purchasers were asked the average lead time they faced for U.S.-produced and imported truck and bus tires in 2021, 2022, and 2023 (table II-12). The average lead time and the longest lead time reported by purchasers decreased from 2021 to 2023 for both U.S. produced and imported truck and bus tires. Purchasers reported an average lead time for U.S. product 2021 and 2022 that was longer than even for the longest lead time that any U.S. producer reported. In contrast, the average lead times that purchasers reported for imports were within the range of the (much longer) lead times reported by the importers.

Table II-12

Truck and bus tires: Purchasers' reported number of days lead time for imported and domestic product by year

Year	U.S. shortest average lead time	U.S. longest average lead time	U.S. average lead time	Import shortest average lead time	Import longest average lead time	Import average lead time
2021	2	300	55	7	365	102
2022	2	275	52	7	200	104
2023	2	120	27	7	180	83

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

Supplier certification

Most purchasers (19 of 25) did not require their suppliers become certified or qualified to sell truck and bus tires to their firm. Purchasers reported that the time to qualify a new supplier ranged from 15 to 90 days. No purchaser reported that any domestic or foreign supplier had failed in its attempt to qualify truck and bus tires or had lost its approved status since 2021.

Minimum quality specifications

As can be seen from table II-13, 19 of 25 responding purchasers reported that domestically produced product always met minimum quality specifications. Fourteen of 23 responding purchasers reported that the truck and bus tires imported from Thailand always met minimum quality specifications.

Table II-13
Truck and bus tires: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	19	4	0	1	1
Thailand	14	6	0	1	2
Nonsubject sources	7	6	0	0	2

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

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

Purchasers were asked if the minimum quality differed between the tires produced in Thailand by different producers, and 16 of 21 responding purchasers reported that truck and bus tires from Thailand did not differ between the Thai producers. Three of the five firms reporting that there was a difference reported that Bridgestone (Thailand) was a high or higher quality producer (one of these also listed Michelin as a high-quality Thai producer).¹⁷

Twenty-five purchasers reported factors that determined quality. Many reported performance or factors relating to performance including durability (wear-out mileage, test results), casing integrity (retreadability), ride, safety, reliability (few complaints, few warranty claims), consistency, speed rating, and ease of mounting. A number of purchasers reported factors related to the producer (brand, policies, reputation, research and development, and technology and automation). Other factors included the rubber and steel used in production, appearance, warranty, certification, and fleet/customer preference.

¹⁷ The other two purchasers specified quality characteristics that differed, but did not report which producers' quality was higher or lower.

Changes in purchasing patterns

Most purchasers (14 of 25) reported that they had changed suppliers since January 1, 2021, while 11 reported that they had not. Specifically, firms dropped or reduced purchases from Cooper, which had been purchased by Goodyear, because Goodyear discontinued Cooper's brand program¹⁸ or Goodyear increased the price of and had not guarantee the supply of, Cooper Tires; reduced Uniroyal and BF Goodrich purchases because Michelin reduced production of these brands; and one purchaser reduced its purchases of various suppliers after mid 2023 because truck and bus tires became by that time tires had become available from its normal supplier. Firms added or increased purchases from Yokohama because of customer requests and because of reducing purchases of Cooper Tires. Between 2021 and 2023 various suppliers were added because of shortages. Fortune (by Prinx) was added due to customer demand, Toyo was added because of a new supply agreement, and Unicorn Tire was added because demand increased.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2021 (table II-14). Purchasers reported increased purchases of U.S.-produced product because of business growth/increased demand and inventory rebalancing. Reasons purchasers reported decreased purchases of U.S.-produced product included: imports were more available, import prices decreased as freight charges declined, the market slowed in late 2023 or early 2024, inventories were overstocked at the end of 2022, Michelin lost a large end-user's business, and prices increased. Purchasers reported increased purchases of product from Thailand because Uniroyal (production) moved to Thailand, purchases were consolidated with Prinx, increased demand/business growth, and end users wanted value priced tires. Purchasers reported decreased purchases of product from Thailand because demand declined, changes in the trucking industry, inventory rebalancing, and changed brands. Purchasers reported increased purchases of product from nonsubject countries because of price, demand/business growth, and inventory rebalancing. Purchasers reported decreased purchases of product from nonsubject countries because of tight markets early in the period and a market slow down.

¹⁸ Cooper Tire did not produce truck and bus tires in the United States.

Table II-14
Truck and bus tires: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Did not purchase
United States	8	2	2	8	2	1
Thailand	3	6	1	9	2	1
Nonsubject sources	8	2	3	6	0	1
Sources unknown	2	1	8	1	1	1

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

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing truck and bus tires produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 21 factors (tables II-15) for which they were asked to rate the importance in table II-11. A plurality of purchasers reported that U.S. and Thai truck and bus tires were comparable on 16 factors. Most reported the U.S. product was superior for delivery time, major brand, and retreadability. For quality exceeds industry standards equal numbers reported U.S. product was superior and U.S. and Thai product were comparable. Most firms reported that U.S. product was inferior on price.

Most purchasers reported that U.S. and nonsubject truck and bus tires were comparable on 16 factors. A plurality of purchasers reported that U.S. product was superior on availability, delivery time, and major brand. Equal numbers responded U.S. product was superior and comparable on availability and on delivery terms. Most firms reported that U.S. product was inferior on price.

Twenty purchasers compared truck and bus tires from Thailand with truck and bus tires from nonsubject countries. Most purchasers reported that Thai imports were comparable to those from nonsubject countries on all factors.

Table II-15**Truck and bus tires: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Thailand	8	9	2
Delivery terms	U.S. v. Thailand	8	10	1
Delivery time	U.S. v. Thailand	12	5	2
Discounts offered	U.S. v. Thailand	2	10	6
Durability/wear resistance	U.S. v. Thailand	7	11	0
Fuel efficiency	U.S. v. Thailand	8	9	0
Major brand	U.S. v. Thailand	13	5	0
Minimum quantity requirements	U.S. v. Thailand	6	11	1
Packaging	U.S. v. Thailand	1	17	0
Payment terms	U.S. v. Thailand	3	15	1
Price	U.S. v. Thailand	1	4	13
Product consistency	U.S. v. Thailand	3	12	2
Product range	U.S. v. Thailand	5	12	0
Quality exceeds industry standards	U.S. v. Thailand	9	9	0
Quality meets industry standards	U.S. v. Thailand	6	12	0
Reliability of supply	U.S. v. Thailand	4	11	3
Retreadability	U.S. v. Thailand	9	8	0
Safety	U.S. v. Thailand	5	13	0
Sold under contract along with services	U.S. v. Thailand	6	7	1
Technical support/service/warranty	U.S. v. Thailand	7	11	0
U.S. transportation costs	U.S. v. Thailand	4	12	2

Table continued.

Table II-15 Continued**Truck and bus tires: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Nonsubject	9	8	1
Delivery terms	U.S. v. Nonsubject	9	9	0
Delivery time	U.S. v. Nonsubject	12	4	2
Discounts offered	U.S. v. Nonsubject	2	10	5
Durability/wear resistance	U.S. v. Nonsubject	6	11	0
Fuel efficiency	U.S. v. Nonsubject	7	8	0
Major brand	U.S. v. Nonsubject	10	7	0
Minimum quantity requirements	U.S. v. Nonsubject	6	11	0
Packaging	U.S. v. Nonsubject	1	16	0
Payment terms	U.S. v. Nonsubject	3	14	1
Price	U.S. v. Nonsubject	3	4	11
Product consistency	U.S. v. Nonsubject	2	15	0
Product range	U.S. v. Nonsubject	3	14	0
Quality exceeds industry standards	U.S. v. Nonsubject	4	13	0
Quality meets industry standards	U.S. v. Nonsubject	5	12	0
Reliability of supply	U.S. v. Nonsubject	4	12	1
Retreadability	U.S. v. Nonsubject	6	9	1
Safety	U.S. v. Nonsubject	3	14	0
Sold under contract along with services	U.S. v. Nonsubject	4	8	1
Technical support/service/warranty	U.S. v. Nonsubject	6	11	0
U.S. transportation costs	U.S. v. Nonsubject	4	10	2

Table continued.

Table II-15 Continued**Truck and bus tires: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Availability	Thailand v. Nonsubject	0	20	0
Delivery terms	Thailand v. Nonsubject	0	19	1
Delivery time	Thailand v. Nonsubject	0	19	1
Discounts offered	Thailand v. Nonsubject	0	18	0
Durability/wear resistance	Thailand v. Nonsubject	1	16	2
Fuel efficiency	Thailand v. Nonsubject	1	16	1
Major brand	Thailand v. Nonsubject	0	14	2
Minimum quantity requirements	Thailand v. Nonsubject	0	17	1
Packaging	Thailand v. Nonsubject	0	17	1
Payment terms	Thailand v. Nonsubject	0	19	0
Price	Thailand v. Nonsubject	2	18	0
Product consistency	Thailand v. Nonsubject	0	17	1
Product range	Thailand v. Nonsubject	0	15	1
Quality exceeds industry standards	Thailand v. Nonsubject	0	16	1
Quality meets industry standards	Thailand v. Nonsubject	0	19	0
Reliability of supply	Thailand v. Nonsubject	1	17	0
Retreadability	Thailand v. Nonsubject	1	16	1
Safety	Thailand v. Nonsubject	1	17	1
Sold under contract along with services	Thailand v. Nonsubject	1	12	2
Technical support/service/warranty	Thailand v. Nonsubject	1	16	1
U.S. transportation costs	Thailand v. Nonsubject	1	16	0

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

Note: With respect to cost/price factors, a rating of superior means that cost/price for the first source in the country pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Tiers (market categories)

All 6 responding U.S. producers, 22 of 26 importers, and 19 of 24 purchasers¹⁹ reported that truck and bus tires are sold in categories or tiers. Most responding firms reported that there were 4 tiers, with some reporting 5 tiers. Firms were asked to identify producers, brands, and differences in characteristics of the tires, sales, and servicers between tires in each tier.²⁰

Most producers (4 of 6), importers (21 of 24), and purchasers (15 of 20) reported that they concentrated in specific tiers. Producers *** reported that most of their sales were of tier 1 truck and bus tires, *** reported most of their sales were in tier 2.²¹ *** reported *** percent of their aftermarket sales were in tier 3 but all U.S. producers reported no tier 3 OEM sales. No U.S. producer reported sales in tier 4.

Twenty importers reported the share of their sales into one or more tiers. Seven of these importers sold into tier 1, and of these, three importers (***) reported that the majority of their sales were into tier 1. Eight importers reported sales into tier 2, and of these, two (***) reported the majority of their sales were in tier 2. Thirteen importers reported sales were in tier 3, and of these, five reported the majority of their sales were in tier 3. Nine importers reported sales in tier 4 and of these, five of these reported the majority of their sales in tier 4. Two importers reported sales in tier 5, one of these reported the majority of its sales were in tier 5.

Purchasers typically purchased tires in multiple tiers, with only one purchaser reporting that all the truck and bus tires it purchased were from one tier, tier 4. Most purchasers (19 of the 20 responding) reported purchasing tier 1 tires. Of these 19 only two reported that more than half of their purchases were of tier 1 product.²² Seventeen purchasers reported purchasing tier 2 truck and bus tires, although only two purchasers reported that more than half of their purchases were of tier 2 product.²³ Eighteen purchasers reported purchasing tier 3 truck and bus tires. Four of these purchasers reported that half or more of the truck and bus tires they

¹⁹ Four OEM purchasers (***) and one aftermarket purchaser (***) reported that the market was not divided into tiers.

²⁰ One purchaser (***) reported that there were no differences between the tires in the various tiers.

²¹ *** did not respond to this question.

²² One of these purchased for OEM use and the other purchased for aftermarket use.

²³ One of these purchasers purchased for OEM use and the other purchased for aftermarket use.

purchased were tier 3.²⁴ Twelve purchasers reported purchasing tier 4 truck and bus tires,²⁵ 3 of the 12 reported most of their purchases were of tier 4 truck and bus tires. Only one purchaser reported purchasing tier 5 truck and bus tires and it reported that most of its purchases were of tier 5 truck and bus tires.²⁶

Firms were asked how frequently tires in the highest and lowest tiers had the same physical characteristics and performance (table II-16). The most common response for importers (13 of 22) and purchasers (8 of 18) was that they were sometimes the same, but most of the remaining importers and purchasers reported that they were never the same. In contrast, three producers (***) reported they were usually the same quality, whereas two (***) reported that they were never the same.²⁷

Petitioners state that Goodyear’s facility in Topeka Kansas produced three brands of truck and bus tiers, Goodyear, Kelly, and Dunlop. The only difference between these tires was the tread compound used, which influenced gas milage.²⁸ Other differences cited by the petitioners between tires could be in the mold used and the tread design.²⁹

Table II-16
Truck and bus tires: Count of firms’ responses regarding if the highest and lowest tiers have the same physical characteristics and performance, by firm type

Firm type	Always	Usually	Sometimes	Never
U.S. producer	0	3	1	2
Importer	2	3	13	7
Purchaser	2	4	8	6

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

Note: ***

²⁴ One of these purchasers reported it was for OEM use and three reported it was for aftermarket use.

²⁵ One of these *** reported some sales of tier 4 product to the OEM market.

²⁶ Purchases of tier 5 tires were in the aftermarket.

²⁷ *** reported that they were sometimes the same quality.

²⁸ Hearing transcript, p. 58 (Juarez).

²⁹ Ibid.

Tier 1

Tier 1 producers were Bridgestone, Continental, Goodyear, and Michelin, all of which produce truck and bus tires in the United States, while Bridgestone and Michelin also produce truck and bus tires in Thailand.³⁰ Tier 1 brands included Bridgestone, Continental, Goodyear, and Michelin. (Firm by firm responses on tier 1 producers and brands are provided in appendix D, table D-1). Tier 1 tires were reported to be sold to OEMs and the largest fleets. Firms reported that tier 1 tire characteristics included: high quality; manufactured by premium/advertised brands; have national programs; and provide strong warranties. (Firm by firm responses on tier 1 markets and characteristics are provided in appendix D, table D-2).

Tier 2

Bridgestone, Continental, Goodyear, Hankook, Michelin, Sumitomo, Toyo, and Yokohama were frequently listed as second tier producers, although a number of purchasers listed other second tier producers. Bridgestone, Continental, Goodyear, Michelin, Sumitomo, and Yokohama are U.S. producers of truck and bus tires. Thai producers listed as tier 2 producers included Bridgestone, General, Michelin, and Yokohama. Tier 2 brands reported included BF Goodrich, Firestone, Dunlop, General, Yoko, Hankook, and Toyo. (Firm by firm responses on tier 2 producers and brands are provided in appendix D, table D-3). Tier 2 tires were sold in a variety of channels including: occasionally used by OEMs, some national account programs for large fleets, used by small to medium sized fleets, sold to owner operators, and they tended to be a replacement brand. Firms reported that tier 2 tire characteristics include: produced by companies for midmarket or offshore brands and are advertised brands with some consumer recognition and dealer incentives.

Quality descriptions for tier 2 tires varied. Some firms reported that tier 2 provided good characteristics including: quality; wide variety of offerings; high value brand; strong warranties; and retreadable. Others reported that tier 2 tires were lower quality than tier 1 including: lower mileage; average wear; does not use the latest technology and compounds; had standard warranty; and were sold with fewer services. (Firm by firm responses on tier 2 markets and characteristics are provided in appendix D, table D-4).

³⁰ Firms listed as Thai producers in this section on tiers include producers that have facilities in Thailand that produced truck and bus tires. The producers, importers, and purchasers, however, typically did not identify the countries in which the truck and bus tires were produced, as a result, the product referred to may have been produced in the United States or imported from a country other than Thailand.

Tier 3

Many producers were listed as producing tier 3 tires; the most commonly listed included CMA, Kumho, Double Coin, Hankook, Goodyear, Michelin, and Yokohama. Thai producers listed as tier 3 producers included Bridgestone, Linglong, General, Michelin, Prinx, Yokohama, and Zhongce. (Firm by firm responses on tier 3 producers and brands are provided in appendix D, table D-5). Tier 3 tires were reported to be sold to owner operators and resellers, have at most limited OEM sales, and tend to lack fleets support and national accounts programs. Firms reported that tier 3 tires generally lacked marketing, may not always be manufactured by the brand owner, and have limited distribution. A number of firms reported reasons that tier 3 tires were attractive including: high quality; have full size line up; have strong casing warranties; are value sales; are an alternative to retreads, and tier 3 is the highest tier that tires without name recognition can be sold into. Disadvantages reported for tier 3 product include: lower quality, and lower profit margins. (Firm by firm responses on tier 3 markets and characteristics are provided in appendix D, table D-6).

Tier 4

Firms reported that tier 4 tires were produced by many different producers and included brands that had not been in the market long as well as private brand/private label. Producers in Thailand that were reported to be tier 4 producers include Deestone, Linglong, Prinx, and Zhongce. (Firm by firm responses on tier 4 producers and brands are provided in appendix D, table D-7). Tier 4 tires were reported to be sold retail with no OEM sales, sold to owner operators, independent drivers, and were sold by smaller aftermarket dealers. Most firms reported tier 4 product was lower quality and have minimal distribution networks. Purchasers were reported to purchase tier 4 because of the low price or as an alternative to retreads. (Firm by firm responses on tier 4 markets and characteristics are provided in appendix D, table D-8).

Tier 5

No producers and few importers (3) and purchasers (3) reported on tier 5 tires. Producers in Thailand that were reported to be tier 5 producers include Linglong, Otani, and Zhongce. (Firm by firm responses on tier 5 producers and brands are provided in appendix D, table D-9. Firm by firm responses on tier 5 markets and characteristics are provided in appendix D, table D-10).

Concentration in tiers

Firms were asked if there were quality differences between tiers. Three of 4 responding U.S. producers,³¹ 19 of 25 importers, and 18 of 20 responding purchasers reported that there were quality differences between tiers. (Firm by firm responses quality differences between tiers are provided in appendix D, table D-11).

Firms were asked to report differences other than quality between tiers. (Firm by firm responses of differences other than quality between tiers are provided in appendix D, table D-12). Firms reported differences included advertising, brand recognition, distribution networks, after sales support, and price.

Of the six U.S. producers responding to the question regarding the tiers they produced, three (***) reported that they concentrated in tiers 1 and 2, one (***) reported concentrating on *** which it reported elsewhere in the questionnaire to be a tier 1 brand, and two (***) reported that they did not concentrate on any tiers.³² Most importers (17 of 20) reported their sales were concentrated in certain tiers. Thirteen reported concentrating on selling to 1 or 2 tiers, and of these two (***) reported concentrating in tier 1, and four importers (***) reported concentrating in tier 2. Five importers (***) reported concentrating in tier 3, and five (***) reported concentrating in tier 4. Most purchasers (15 of 20 responding) reported concentration in specific tiers. (Purchaser firm by firm responses of reasons purchasers concentrate in certain tiers and the tiers in which they concentrate are provide in appendix D table D-13).

Producers, importers, and purchasers were asked if their sales or purchases had shifted between tiers since January 2021. Two (***) of six responding producers reported changing the tiers. *** reported its sales to tier 1 were unchanged but its sales to tiers 2 and 3 had changed and *** reported that its sales of tier 1 had declined due to weak demand and competition from imports. Two of 24 responding importers reported shifting between tiers and both reported relatively small changes. Twelve of

³¹ ***.

³² Elsewhere in the questionnaire *** reported that all of its sales were in tier 2 and *** reported that *** of its sales were in tier 2 while ***.

20 responding purchasers reported switching between tiers. Reasons purchasers changed the tiers they purchased in included: availability and customers became more price sensitive.

Purchasers were asked how frequently they and their customers compared prices between and within market tiers (table II-17). Most purchasers and their customers always or usually compare prices both between tiers and within tiers.

Table II-17
Truck and bus tires: Count of purchasers' responses on how frequently they or their customers compare prices of truck and bus tires between market tiers and within market tiers

Compare prices	Firm type	Always	Usually	Sometimes	Never
Between tiers	Purchaser	6	9	3	2
Between tiers	Their customers	4	9	4	1
Within tiers	Purchaser	8	10	1	0
Within tiers	Their customers	5	11	2	0

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

Branding

Producers, importers, and purchasers were asked if branded and private label truck and bus tires were competitive on price and quality. Three of the 5 responding producers, 16 of the 28 responding importers, and 9 of 20 responding purchasers reported that private label and branded truck and bus tires were very competitive on price (tables II-18). Firms generally reported that private labels were in tier 4. Reasons firms provided that private label and branded product was very competitive on price included:

- Private labels are typically lower-priced;
- Private label is competitive in the minds of the consumers for lifetime cost;
- Lower tier prices are far lower than higher tier;
- Lower tiers typically perform as well as higher tiers but lack the marketing, overhead, and national presence;
- Tier 4 brands are lower-priced because they do not cost as much to make, they are lighter and lower quality;
- Tier 1 sets the price for other tiers; and
- Tiers 1 and 2 focus on OEM and national fleets.

Reasons firms provided that private label and branded product was somewhat competitive on price included:

- This depends on if the private label is purchased by a large buying group;
- Private labels sometimes cost more because of smaller production volume;
- Private labels spend less on management and promotions;
- Firms' willingness to pay the higher price of higher tiers indicate that they perceive quality in the higher tiers; and
- Higher tiers cost more, tier 1 prices are 50 percent higher than tier 4 prices, tier 2 prices are 30 percent higher (than tier 4 prices), and tier 3 prices are 15 percent higher (than tier 4 prices).

Reasons firms reporting that they were not competitive on price included:

- Private label tires were usually low quality and much cheaper;
- There are few private label truck tires;
- This depends on the factory in which the tires are made; and
- Private label tires are considered to be tier 4 or lower.

Table II-18
Truck and bus tires: Count of U.S. producers, importers, and purchasers reporting on the competitiveness of private label tires with their name-brand counterparts in terms of price and quality, by firm type

Firm type	Factor	Very competitive	Somewhat competitive	Not competitive
Producers	Price	3	2	0
Importers	Price	16	10	3
Purchasers	Price	9	8	3
Producers	Quality	0	4	1
Importers	Quality	9	15	4
Purchasers	Quality	3	15	2

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

None of the 5 responding producers, but some importers (9 of 27), and purchasers (3 of 20) reported branded and private label tires were very competitive on quality. Reasons that firms gave for branded and private label being very competitive on quality included:

- Quality is the most important factors;
- There is robust testing and quality control;
- Brands cannot survive with bad product; and
- Lower tier tires typically perform as well as higher tiers but lack the marketing overhead and national presence.

Most producers (4 of 5), importers (14 of 27), and purchasers (15 of 20) reported that branded and private label tires were somewhat competitive on quality. Reasons firms gave for branded and private label being somewhat competitive on quality include:

- Well-known brands command price premium because of performance;
- All truck and bus tires meet NHTSA standards, but name brands may have other features;
- Branded and private label that are in the same tier may be competitive in quality, but private label tires are not sold in tier 1 and 2;
- Performance differences can be significant;
- Name brands have good design and quality control;
- Purchasers' willingness to pay for higher prices for higher tiers indicate they perceive these as being higher quality; and
- Cost needs to be compared on a per mile basis.

One U.S. producer, four importers, and two purchasers reported that branded and private label were not competitive on quality. Reasons firms gave that branded and private label were not competitive on quality include:

- Quality and performance are better with higher priced brands, and
- Private label tires are generally low quality.

Purchasers were asked how frequently they or their customers made purchase decisions based on brands. The most common response for the purchasers (10 of 25) and their customers (9 of 23) was usually (table II-19). Reasons that purchasers or their customers purchased based on brand included: having strategic suppliers; following a multi brand strategy; brand determines purchase decisions for tires in tiers 1 and 2; brand reflects the producer and indicates the quality and value; and customers have relationship/contracts with tire producers.

Table II-19
Truck and bus tires: Count of purchasers' responses regarding frequency of purchasing decisions based on brand

Firm making decision	Always	Usually	Sometimes	Never
Purchaser	4	10	5	6
Customer	2	9	7	5

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

Firms were asked if they sell/purchase branded and private label truck and bus tires with the same specifications at different prices. None of the 6 responding producers reported that they did, but 5 of 30 importers, and 5³³ of the 24 responding purchasers reported that they did. Reasons that firms reported selling or purchasing branded and private label with the same specifications at different prices included:

- Branded have more overhead costs for marketing, and customer prefer certain brands;
- Branded suppliers have marketing, salesforce support, and national account programs that increase costs;
- Private labeling is done to specific customer needs and result in similar prices;
- Prices differ by order quantity; and
- Freight determines costs.

Comparison of U.S.-produced and imported truck and bus tires

In order to determine whether U.S.-produced truck and bus tires can generally be used in the same applications as imports from Thailand, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-20, three producers reported that all country pairs were either always and three reported that they were sometimes interchangeable, while most importers and purchasers reported that they were always or frequently interchangeable.

Reasons interchangeability was limited include:

- Different countries may use different standards for testing marketing and speed capability;
- Each factory has specific equipment and access to certain raw materials which may reduce their ability to produce for every market;
- Different markets have different needs. For example, tires for Europe are designed for higher speed and greater wet traction than those for the U.S. market;
- U.S. tire manufacturers are only willing to produce tier 1 and 2 tires and are not willing to produce tier 4 tires;
- U.S.-produced tires are interchangeable with those from Europe and Japan but not Thailand;
- Different countries produce different brands and size ranges;

³³ One of these reported purchasing only private label and one reported it did not purchase private label.

- Case size and durability may differ from plant to plant; and
- The quality of tier 3 and 4 tires may be inadequate for some applications.

Table II-20
Truck and bus tires: Count of U.S. producers, importers, and purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Country pair	Firm type	Always	Frequently	Sometimes	Never
U.S. vs. Thailand	Producer	3	0	3	0
U.S. vs. other	Producer	3	0	3	0
Thailand vs. Other	Producer	3	0	3	0
U.S. vs. Thailand	Importer	14	6	4	2
U.S. vs. other	Importer	11	5	6	1
Thailand vs. Other	Importer	14	4	4	1
U.S. vs. Thailand	Purchaser	13	11	1	0
U.S. vs. other	Purchaser	12	11	2	0
Thailand vs. Other	Purchaser	11	12	1	0

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

Firms were also asked if their response on interchangeability differed between Bridgestone (Thailand), Prinx, and other producers in Thailand—4 of 5 U.S. producers, 24 of 25 of importers, and 22 of 24 purchasers responded that there were no differences in interchangeability between producers in Thailand. Differences reported by the remaining firms on the interchangeability of Thailand producers included: tier 1 tires produced in Thailand will differ from tier 3 tires produced in Thailand and premium manufacturers adhere to global standards.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of truck and bus tires from the United States, subject, or nonsubject countries. As seen in table II-21, most producers reported there were sometimes or never differences other than price for all country pairs, while most importers and purchasers reported that there were either frequently or sometimes differences other than price. Reported factors other than price included:

- Brands (U.S. producers with plants outside the United States provide the same product regardless of country of manufacturer);
- Transportation network (great uncertainty in shipping costs of product from Thailand);
- Quality (cost per mile may be higher for lower cost tires, retreadability, speed ratings);

- Product support (warranties, Thai product does not have the nationwide network for service and support, tier 3 and 4 lack field support);
- Different tiers (there is no U.S. production of tier 4 tires but these are produced in Thailand, most U.S. product is tier 1 but imports tend not to be tier 1);
- Different payment terms;
- Product range; and
- Available capacity.

Table II-21

Truck and bus tires: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Country pair	Type	Always	Frequently	Sometimes	Never
U.S. vs. Thailand	Producer	0	0	3	2
U.S. vs. other	Producer	0	0	3	2
Thailand vs. Other	Producer	0	0	2	2
U.S. vs. Thailand	Importer	5	6	10	3
U.S. vs. other	Importer	4	4	12	4
Thailand vs. Other	Importer	3	3	10	3
U.S. vs. Thailand	Purchaser	4	6	11	3
U.S. vs. other	Purchaser	4	6	11	3
Thailand vs. Other	Purchaser	2	5	13	3

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

Firms were also asked if their response on differences other than price differed between Bridgestone (Thailand), Prinx, and other producers in Thailand. Two of 4 U.S. producers, 16 of 24 importers and 18 of 24 purchasers responded that there were no differences other than price for truck and bus tires from these sources. Differences other than price for the Thailand producers reported by the remaining firms included:

- Bridgestone’s tires produced in Thailand may differ from those of other producers;
- Bridgestone produces tier 1 tires in Thailand;
- Bridgestone and some other Thai suppliers produced higher quality tires with better product range and technical support;
- Bridgestone’s tires are higher quality than Prinx’s tires;
- Performance differed by brand (premium manufacturers adhere to global standards);
- Some Thai producers’ produce low quality tires;
- Tier 1 tires from Thailand differs from the tier 3 tires from Thailand; and
- Tires from different producers differ on price, availability, distribution/dealer network.

Firms were asked to provide other explanations for their answers in their questionnaires. Responses included:

- Bridgestone and Michelin sell the tires they produce in Thailand at the same prices that they sell tires from other sources;
- U.S. producers have an average lead time of over 30 days but will not provide a fill date, imports require more time for delivery, but they provide a fill date allowing the purchaser to plan based on this; and
- The purchaser purchases imports in order to be able to serve all market tiers.

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates. No comments were received.

U.S. supply elasticity

The domestic supply elasticity for truck and bus tires measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of truck and bus tires. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced truck and bus tires. Analysis of these factors above indicates that the U.S. industry has the ability to somewhat increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 6 is suggested.

U.S. demand elasticity

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

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.³⁴ Product differentiation, in turn, depends upon such factors as brand, quality (e.g., formulation, longevity, gas milage, retreadability, appearance, etc.) and conditions of sale (e.g., availability, warranties, fleet contracts (services), etc.). Based on available information, the elasticity of substitution between U.S.-produced truck and bus tires and imported truck and bus tires is likely to be in the range of 3 to 5. Truck and bus tires are evaluated based on tiers, and may be considered less substitutable across tiers than within tiers. Tires produced in Thailand are available in all tiers, however, most tires produced in Thailand are considered tiers 3 and 4 while almost no U.S.-produced tires are considered tiers 3 and 4. This acts as a limiting factor when considering the substitutability between most U.S.-produced tires and most tires imported from Thailand.

³⁴ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

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

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the dumping margins was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of seven firms that accounted for virtually all U.S. production of truck and bus tires during 2023.

U.S. producers

The Commission issued a U.S. producer questionnaire to seven firms based on information contained in the petition and identified in the preliminary phase of this investigation. Seven firms provided usable data on their operations. Tables III-1 lists U.S. producers of truck and bus tires, their production locations, positions on the petition, and shares of total production. *** responding U.S. producers accounting for *** took no position regarding the petition, *** expressed support for the petition, and *** expressed opposition to the petition. The petitioner, USW, represents production facilities for three of the seven responding U.S. producers (Bridgestone Americas, Goodyear, and Sumitomo Rubber), accounting for *** percent of reported U.S. production of truck and bus tires in 2023.

Table III-1

Truck and bus tires: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2023

Shares in percent

Firm	Position on petition	Production location(s)	Share of production	Share of production covered by USW
Bridgestone Americas	***	Lavergne, TN Morrison, TN	***	***
Continental Tire	***	Fort Mill, SC Mt. Vernon, IL Clinton, MS	***	***
Goodyear	***	Topeka, KS Danville, VA	***	***
Michelin NA	***	Spartanburg, SC	***	***
Specialty Tires	***	Indiana, PA Unicoi, TN Indiana, PA	***	***
Sumitomo Rubber	***	Tonawanda, NY	***	***
Yokohama Tire	***	West Point, MS	***	***
All firms	Various	Various	100.0	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--",

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table III-2

Truck and bus tires: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued.

Table III-2 Continued
Truck and bus tires: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
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***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued.

Table III-2 Continued

Truck and bus tires: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

As indicated in table III-2, U.S. producers Bridgestone Americas, Michelin NA, and Yokohama Tire are related to foreign producers of truck and bus tires in Thailand and U.S. producer Yokohama Tire is related to a U.S. importer of truck and bus tires from Thailand.¹ In addition, as discussed in greater detail below, U.S. producers *** directly import truck and bus tires from subject sources in Thailand. No U.S. producer reported purchasing the subject merchandise from U.S. importers.

¹ Bridgestone Thai production announcement, https://www.bridgestone.co.th/en/media-centre/press-release/2023/official-notification_stop-tire-manufacturing-operations-at-rangsit-plant, retrieved October 23, 2024. Article on Michelin's investments in Thai tire production, <https://www.usedrubbermachine.com/over-2-3-billion-tire-giant-michelin-invests-heavily-in-thailand.html>, retrieved October 22, 2024. List of Yokohama global subsidiaries and affiliates, <https://www.y-yokohama.com/global/profile/location/overseas/>, retrieved October 22, 2024

Table III-3 presents events in the U.S. industry since January 1, 2021.

**Table III-3
Truck and bus tires: Important industry events since 2021**

Date	Firm	Event
March 2022	Sumitomo Rubber	Groundbreaking of \$129 million expansion to double New York capacity for consumer and truck-bus tires.
August 2022	Hankook Tire	Announced \$1.6 billion phased expansion at Tennessee plant; to double consumer tire capacity and add first truck-bus tire capacity; final total plant capability of 11 million tires annually.
May 2023	Bridgestone Americas	Groundbreaking of \$60 million Texas truck-bus tire retread expansion.
June 2023	Sumitomo Rubber	\$129 million consumer and truck-bus tire expansion at New York plant expected operational during 2023 – 2024 period.
August 2023	Bridgestone Americas	Groundbreaking of \$550 million truck-bus radial tire expansion at its flagship plant in Warren County, Tennessee; all construction phases expected complete in 2026.
December 2023	Hankook Tire	Phases two and three activated and preparatory work begun on \$1.6 billion expansion at Clarksville, Tennessee, plant; consumer tire capacity to double to 10 million tires annually; first truck-bus capacity of one million tires annually; online late-2025 to early-2026.
January 2024	Hankook Tire	Clayco awarded contract for construction of Hankook Clarksville, Tennessee, Phase 2 and Phase 3 consumer and truck-bus tire expansion project.
June 2024	Goodyear	As first part of its three-pronged “Goodyear Forward” reorganization plan, agreed to sell global OTR tire assets of \$905 million to Yokohama Rubber under a five-year tolling provision from current Goodyear OTR/truck-bus tire plants worldwide, of which OTRs are produced at Topeka Kansas.
October 2024	Longshoremen’s Association	Some 45,000 Longshoremen’s dock workers went out on strike October 1, 2024, over wages and port automation, closing trade through all 36 U.S. East and Gulf Coast ports from Maine to Texas; an estimated 50 percent of all U.S. containerized volume, including tire trade, was impacted. A tentative wage agreement was reached on October 4, and ports reopened under the existing contract through January 15, 2025.
October 2024	Sumitomo Rubber	New York tire plant expansion ongoing.

Source: Sumitomo News, <https://sumitomorubber-usa.com/news/article:03-29-2022-12-00am-groundbreaking-ceremony/>, March 29, 2022. Hankook News, <https://www.hankooktire.com/us/en/company/media-center/media-detail.627001.html?tabCode=&contentType=>, August 29, 2022. Michelin NA,

<https://michelinmedia.com/pages/blog/detail/article/c/a1271/>, March 14, 2023. Bridgestone News, <https://www.bridgestoneamericas.com/en/newsroom/press-releases/2023/bandag-abilene-expansion-groundbreaking>, May 16, 2023. Sumitomo, <https://www.tirebusiness.com/mid-year-report/sumitomo-moves-forward-new-york-plant-expansion>, June 20, 2023. Bridgestone News, <https://www.bridgestoneamericas.com/en/newsroom/press-releases/2023/warren-plant-expansion-groundbreaking>, August, 16, 2023. Hankook, Clarksville, TN, Press, <https://clarksvillenow.com/local/hankook-tire-to-more-than-double-production-becoming-largest-private-employer-in-clarksville/>, December 7, 2023; Clayco News, <https://claycorp.com/latest/clayco-awarded-hankook-tire-expansion-project-in-clarksville-tennessee>, February 20, 2024. Goodyear SEC Form 10-Q, June 30, 2024, Note 15. Subsequent Events, p. 26, <http://investor.goodyear.com>, July 31, 2024. NPR, <https://www.npr.org/2024/10/03/nx-s1-5139450/dockworkers-port-strike-deal>. CNBC, <https://www.cnbc.com/2024/10/03/port-strike-ends-as-workers-agree-to-tentative-deal-on-wages-and-contract-extension.html>. Hearing transcript, p. 24 (O'Shei).

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of truck and bus tires since 2021. Three of seven producers indicated in their questionnaires that they had experienced such changes.

Table III-4 presents the changes identified by these producers.

Table III-4
Truck and bus tires: U.S. producers' reported changes in operations, since January 1, 2021

Item	Firm name and narrative response on changes in operations
Prolonged shutdowns	***
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***
Expansions	***
Other	***
Other	***

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

Producers in the United States were asked to report in changes in their supply chain arrangements, production, employment, and shipments relating to truck and bus tires since 2021 as a result of the COVID-19 pandemic or government actions taken to contain the spread of the COVID-19 virus. Four of seven producers indicated in their questionnaires that they had experienced such changes. Table III-5 presents the changes identified by these producers.

Table III-5

Truck and bus tires: U.S. producers' reported effect of COVID-19 on operations, since January 1, 2021

Item	Narrative response on COVID impact on operations
***	***
***	***

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

U.S. production, capacity, and capacity utilization

Table III-6 presents U.S. producers' installed and practical capacity and production on the same equipment.

Table III-6

Truck and bus tires: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as subject production, by period

Capacity and production in 1,000 units; utilization in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	25,409	25,188	24,323	12,630	12,086
Installed overall	Production	17,642	17,467	16,969	8,855	8,398
Installed overall	Utilization	69.4	69.3	69.8	70.1	69.5
Practical overall	Capacity	20,352	19,849	19,368	9,915	9,979
Practical overall	Production	17,642	17,467	16,969	8,855	8,398
Practical overall	Utilization	86.7	88.0	87.6	89.3	84.2
Practical truck and bus tires	Capacity	15,377	15,041	14,599	7,529	7,425
Practical truck and bus tires	Production	13,604	13,532	12,691	6,719	6,269
Practical truck and bus tires	Utilization	88.5	90.0	86.9	89.2	84.4

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

Installed overall capacity declined from 2021 to 2023 by 4.3 percent and was 4.3 percent lower in January-June 2024 than in January-June 2023. Four of the seven U.S. producers reported reductions in installed overall capacity between 2021 and 2023, the largest of which was the *** percent decline reported by ***.² ³ Overall production followed a similar trend, declining by 3.8 percent from 2021 to 2023, and was 5.2 percent lower in January-June 2024 than in January-June 2023. Three of seven firms reported reductions in overall production from 2021 to 2023, with *** reporting the largest decline, of *** percent.⁴ Installed overall capacity utilization fluctuated but remained between 69.3 and 69.8 percent from 2021 to 2023 and was 0.6 percentage points lower in January-June 2024 than in January-June 2023.

Practical overall capacity likewise declined by 4.8 percent from 2021 to 2023 but was slightly (0.6 percent) higher in January-June 2024 relative to January-June 2023. The comparable rate of decline for both practical overall capacity and practical overall production during 2021-23 was reflected in practical overall capacity utilization remaining between 86.7 percent and 88.0 percent over the same period.

Practical truck and bus tire capacity and production followed similar trends as those of installed and practical overall capacity and production, with truck and bus tire capacity and production steadily declining by 5.1 and 6.7 percent, respectively, and capacity utilization irregularly fluctuating between 86.9 percent and 90.0 percent from 2021 to 2023.

Table III-7 presents U.S. producers' reported narratives regarding practical capacity constraints. *** U.S. producers reported production restraints for production of truck and bus tires.

² *** reported no change in installed overall capacity between 2021 and 2023, while *** reported a slight (***) increase over the same period.

³ ***. *** U.S. producer questionnaire, section II-3c.

⁴ *** also reported declines in practical overall production of *** percent and *** percent, respectively.

Table III-7
Truck and bus tires: U.S. producers' reported constraints to practical overall capacity since January 1, 2021

Item	Firm name and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Storage capacity	***
Other constraints	***
Other constraints	***
Other constraints	***

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

Table III-8 and figure III-1 present U.S. producers' production, capacity, and capacity utilization.

Table III-8
Truck and bus tires: U.S. producers' output, by firm and period
Practical capacity

Capacity in 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	15,377	15,041	14,599	7,529	7,425

Table continued.

Table III-8 Continued
Truck and bus tires: U.S. producers' output, by firm and period
Production

Production in 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	13,604	13,532	12,691	6,719	6,269

Table continued.

Table III-8 Continued
Truck and bus tires: U.S. producers' output, by firm and period
Capacity utilization

Capacity utilization ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	88.5	90.0	86.9	89.2	84.4

Table continued.

Table III-8 Continued
Truck and bus tires: U.S. producers' output, by firm and period
Share of production

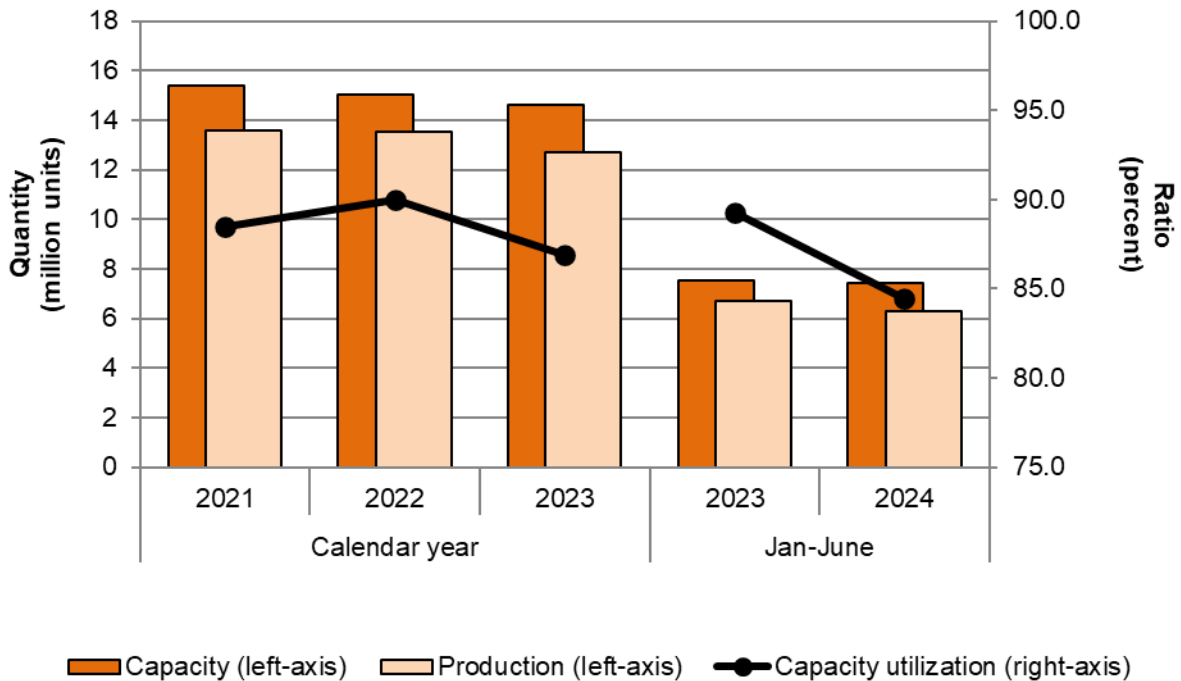
Shares of production in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

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

Figure III-1
Truck and bus tires: U.S. producers' capacity, production, and capacity utilization, by period



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

U.S. producers' average capacity steadily declined by 5.1 percent between 2021 and 2023 and was 1.4 percent lower in January-June 2024 compared to January-June 2023. Only two firms, ***, reported net increases in truck and bus tires capacity from 2021 to 2023, increases of *** and *** percent, respectively, and these two firms accounted for *** of U.S. producers' aggregate capacity in all periods reported.⁵ *** reported the largest decrease in truck and bus tires capacity during 2021-23, a decline of *** percent, which accounted for *** of the overall decline in U.S. producers' truck and bus tires capacity over that period.

U.S. producers' production declined annually during 2021-23, for a two-year decline of 6.7 percent, the bulk of which was in 2023. The entirety of the 2021-23 decline in U.S. producers' production of truck and bus tires was due to declines of *** and *** percent reported by *** and ***, respectively, which were also the

⁵ ***, *** U.S. producer questionnaire, section II-2a.

*** producers of truck and bus tires in all periods reported.⁶ ⁷ U.S. production was 6.7 percent lower during January-June 2024 compared with January-June 2023, with *** reporting lower production levels in the 2024 interim period.⁸ Individual producers' shares of overall truck and bus tire production from 2021 to 2023 remained relatively stable, with *** reporting the largest change, a decline of *** percentage points.

Capacity utilization increased from 2021 to 2022, by 1.5 percentage points, before declining from 2022 to 2023, for a net decline of 1.5 percentage points. ***, reported a net decline in capacity utilization from 2021 to 2023, of *** percentage points, and *** operated at or above 69.4 percent capacity utilization during this timeframe.⁹ Three firms (***) operated at or above *** percent capacity utilization in 2023. U.S. producers' overall capacity utilization was 4.8 percentage points lower in January-June 2024 than in January-June 2023, with the largest relative decline, of *** percentage points, reported by ***.

⁶ Regarding its decline in production of truck and bus tires from 2021 to 2023, ***, *** U.S. producer questionnaire, section II-2a.

⁷ *** reported growth of between *** and *** percent in production of truck and bus tires from 2021 to 2023, while *** reported growth of *** percent over the same period. *** reported 2021-23 production growth of *** percent, but never exceeded *** percent as a share of U.S. producers' total truck and bus tires production.

⁸ ***, *** U.S. producer questionnaire, section II-2a.

⁹ ***.

Alternative products

Table III-9 presents data on U.S. producers' overall and shared production on the same equipment, machinery, or employees as used to produce truck and bus tires. As shown in table III-9, approximately three-quarters of the product produced by U.S. producers on shared equipment was truck and bus tires. Five firms reported producing alternative products on the same equipment used to produce truck and bus tires.¹⁰ However, only *** reported the ability to switch production between truck and bus tires and alternative products using the same equipment and machinery.

Table III-9
Truck and bus tires: U.S. producers' overall production on the same equipment as subject production, by product type and period

Quantity in 1,000 units, shares in percent

Product type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Truck and bus tires	Quantity	13,604	13,532	12,691	6,719	6,269
PVLT tires	Quantity	***	***	***	***	***
OTR tires	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-Scope products	Quantity	4,038	3,935	4,278	2,136	2,129
All products	Quantity	17,642	17,467	16,969	8,855	8,398
Truck and bus tires	Share	77.1	77.5	74.8	75.9	74.6
PVLT tires	Share	***	***	***	***	***
OTR tires	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out-of-Scope products	Share	22.9	22.5	25.2	24.1	25.4
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Between 2021 and 2023, production of truck and bus tires declined by 6.7 percent, while the production of out-of-scope products increased by 5.9 percent, resulting in an increase of 2.3 percentage points for out-of-scope products as a share of overall production. In January-June 2024, production of truck and bus tires was lower relative to January-June 2023, while production of out-of-scope products remained relatively flat. Accordingly, out-of-scope

¹⁰ The higher shares of out-of-scope products later in the period for which data were collected reflects greater production of PVLT tires. ***. U.S. producer questionnaire, section II-3a.

products accounted for a slightly (1.3 percentage points) greater share of production in January-June 2024 than in January-June 2023.

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

Table III-10 presents U.S. producers' U.S. shipments, export shipments, and total shipments.¹¹

Table III-10
Truck and bus tires: U.S. producers' shipments, by destination and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit; shares in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. shipments	Quantity	12,365	12,317	10,658	5,249	5,279
Export shipments	Quantity	1,041	919	878	436	454
Total shipments	Quantity	13,406	13,236	11,536	5,685	5,733
U.S. shipments	Value	3,613,367	4,205,736	3,759,373	1,843,387	1,860,963
Export shipments	Value	276,515	287,681	271,434	133,976	141,218
Total shipments	Value	3,889,882	4,493,417	4,030,807	1,977,363	2,002,181
U.S. shipments	Unit value	292	341	353	351	353
Export shipments	Unit value	266	313	309	307	311
Total shipments	Unit value	290	339	349	348	349
U.S. shipments	Share of quantity	92.2	93.1	92.4	92.3	92.1
Export shipments	Share of quantity	7.8	6.9	7.6	7.7	7.9
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	92.9	93.6	93.3	93.2	92.9
Export shipments	Share of value	7.1	6.4	6.7	6.8	7.1
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

¹¹ ***. *** U.S. producer questionnaire, section II-6.

U.S. shipments by quantity decreased by 13.8 percent from 2021 to 2023, as the value of U.S. shipments irregularly increased by 4.0 percent over the same period. The value of U.S. shipments first rose by 16.4 percent from 2021 to 2022, before then declining by 10.6 percent from 2022 to 2023.¹² The 2021-23 increase in value and decrease in quantity led to an increase of 20.7 percent in the average unit value (“AUV”) of U.S. shipments over the same period. Only *** reported net increases in the quantity of U.S. shipments from 2021 to 2023, with increases of *** percent and *** percent, respectively.¹³ The largest decline by quantity was reported by ***, which reported a steady decline of *** percent from 2021 to 2023. *** accounted for the vast majority of the overall 2021-23 decline in U.S. shipments across all U.S. producers. In terms of value, *** was the only firm which did not report a net 2021-23 increase in the value of U.S. shipments. In January-June 2024, U.S. producers’ U.S. shipments were 0.6 and 1.0 percent higher than in January-June 2023 in terms of quantity and value, respectively, resulting in AUVs in January-June 2024 remaining relatively flat compared to January-June 2023.

*** reported exports of truck and bus tires, and the quantity of export shipments followed a similar trajectory to U.S. shipments, steadily declining from 2021 to 2023 for a two-year decline of 15.7 percent.¹⁴ In addition, the value of export shipments irregularly declined from 2021 to 2023, by 1.8 percent. However, as the magnitude of the 2021-23 decline in value was outpaced by the decline in the quantity of export shipments, the AUV of export shipments increased irregularly by 16.4 percent from 2021 to 2023. The AUV of export shipments was higher in January-June 2024 than in January-June 2023.

As U.S. shipments never accounted for less than 92.1 percent of total shipments by quantity, and 92.9 percent of total shipments by value, trends for U.S. shipments were reflected in trends for total shipments. Accordingly, total shipments steadily declined by 13.9 percent during 2021-23, by quantity, irregularly increased by 3.6 percent in terms of value, and the AUV

¹² Although *** reported increases in the value of U.S. shipments of truck and bus tires from 2021 to 2022, *** firms reported decreases from 2022 to 2023, including ***.

¹³ ***.

¹⁴ Of the firms which reported exports of truck and bus tires, each firm reported exports in ***. ***. U.S. producer questionnaire, section II-8.

increased by 20.4 percent over the same two-year period. The quantity, value, and AUV of total shipments remained essentially flat in January-June 2024 relative to January-June 2023.

Tables III-11 and III-12 present U.S. producers' U.S. shipments of truck and bus tires by shipment type and by period.

Table III-11
Truck and bus tires: U.S. producers' U.S. shipments, by type and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit

Channel and branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Commercial U.S. shipments	Quantity	9,937	9,909	8,510	4,253	4,360
Lease shipment	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
U.S. shipments	Quantity	12,365	12,317	10,658	5,249	5,279
Commercial U.S. shipments	Value	2,788,526	3,255,865	2,903,613	1,439,952	1,501,454
Lease shipment	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	3,613,367	4,205,736	3,759,373	1,843,387	1,860,963
Commercial U.S. shipments	Unit value	281	329	341	339	344
Lease shipment	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	292	341	353	351	353

Table continued.

Table III-11 Continued
Truck and bus tires: U.S. producers' U.S. shipments, by type and period

Shares in percent

Channel and branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Commercial U.S. shipments	Share of quantity	80.4	80.4	79.8	81.0	82.6
Lease shipment	Share of quantity	***	***	***	***	***
Internal consumption	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	77.2	77.4	77.2	78.1	80.7
Lease shipment	Share of value	***	***	***	***	***
Internal consumption	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
U.S. shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Table III-12
Truck and bus tires: U.S. producers' narratives on related firms

Firm	Narrative response on related firms
***	***
***	***
***	***
***	***
***	***

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

U.S. producers reported *** internal consumption during the period for which data were collected, as commercial shipments consistently accounted for approximately 80 percent of U.S. shipments by quantity, and approximately 77 percent, by value, with the share of total shipments accounted for by commercial U.S. shipments highest in the January-June 2024 period. Transfers to related firms were *** in terms of both quantity and

value in all periods reported, though were lower in January-June 2024 relative to January-June 2023, as a share of total U.S. shipments of truck and bus tires. Only *** reported lease shipments during the period for which data were collected.

The AUVs of U.S. producers' commercial shipments and transfers to related firms grew by 21.6 and *** percent from 2021 to 2023, while the AUV of lease shipments declined irregularly after peaking in 2021 for a 2021-23 decrease of *** percent. In January-June 2024, however, the AUV of commercial U.S. shipments and lease shipments were 1.7 percent and *** percent higher than in January-June 2023, whereas the AUV of transfers to related firms was *** percent lower. U.S. producers reported that *** consistently had the highest AUV of any shipment type.¹⁵

U.S. producers' inventories

Table III-13 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments.¹⁶ U.S. producers' inventories of truck and bus tires increased from 2021 to 2023, for a net increase of 75.0 percent, and were 23.8 percent higher in January-June 2024 than in January-June 2023.¹⁷ ¹⁸ Inventories of truck and bus tires as a ratio to U.S. production, U.S. shipments, and total shipments all increased from 2021 to 2023, and all reached their highest levels in the half year ending June 2024.

¹⁵ Although U.S. producers' internal consumption had a higher AUV than other shipment types in certain periods, as the quantity ***, it is excluded from this comparison.

¹⁶ Commission staff also requested that firms report the quantity of inventories under lease. As a whole, inventories under lease increased by *** percent from 2021 to 2023, at *** in 2023, and were *** percent lower in January-June 2024 relative to January-June 2023. *** accounted for *** of all such inventories in every period reported, and only *** also reported inventories under lease. U.S. producer questionnaire, section II-10.

¹⁷ Other than ***, all responding U.S. producers reported inventory of truck and bus tires in all periods, and reported net increases from 2021 to 2023. *** of the increase in inventories from 2021 to 2023 was accounted for by ***, which reported a *** percent increase of *** tires during that period. With the exception of ***, all U.S. producers which reported inventories of truck and bus tires reported higher inventory levels in January-June 2024 compared to January-June 2023.

¹⁸ ***. *** inventory in 2023 was *** tires, compared to *** tires in 2021 and *** tires in 2022. *** U.S. producer questionnaire, section II-2a.

Table III-13
Truck and bus tires: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 units; ratios in percent

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
End-of-period inventory quantity	1,937	2,304	3,390	3,268	4,047
Inventory ratio to U.S. production	14.2	17.0	26.7	24.3	32.3
Inventory ratio to U.S. shipments	15.7	18.7	31.8	31.1	38.3
Inventory ratio to total shipments	14.4	17.4	29.4	28.7	35.3

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

U.S. producers' imports from Thailand

U.S. producers' imports of truck and bus tires are presented in tables III-14 through III-18. Of the U.S. producers which reported imports from Thailand, *** reported an increase in subject imports from 2021 to 2023. *** reported lower volumes in January-June 2024 relative to 2023.

Table III-14
Truck and bus tires: *'s U.S. production, imports from Thailand, and ratio of imports from Thailand to production, by period**

Quantity in 1,000 units; ratios in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. production	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Imports from Thailand to U.S. production	Ratio	***	***	***	***	***

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

Table III-15
Truck and bus tires: *'s U.S. production, imports from Thailand, and ratio of imports from Thailand to production, by period**

Quantity in 1,000 units; ratios in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. production	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Imports from Thailand to U.S. production	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table III-16**Truck and bus tires: ***'s U.S. production, imports from Thailand, and ratio of imports from Thailand to production, by period**

Quantity in 1,000 units; ratios in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. production	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Imports from Thailand to U.S. production	Ratio	***	***	***	***	***

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

Table III-17**Truck and bus tires: ***'s U.S. production, imports from Thailand, and ratio of imports from Thailand to production, by period**

Quantity in 1,000 units; ratios in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. production	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Imports from Thailand to U.S. production	Ratio	***	***	***	***	***

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

Note: Imports from Thailand include ***.

Table III-18**Truck and bus tires: U.S. producers' reasons for importing**

Item	Narrative response on reasons for importing
***'s reason for importing	***
***'s reason for importing	***
***'s reason for importing	***
***'s reason for importing	***

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

U.S. producers' purchases of imports from Thailand

No responding U.S. producer reported purchases of truck and bus tires from Thailand during 2021-2023 or in either January-June 2023 or January-June 2024.

U.S. employment, wages, and productivity

Table III-19 shows U.S. producers' employment-related data.

Table III-19

Truck and bus tires: U.S. producers' employment related information, by item and period

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Production and related workers (PRWs) (number)	8,207	8,771	9,047	8,945	8,870
Total hours worked (1,000 hours)	16,218	16,632	16,931	8,618	8,391
Hours worked per PRW (hours)	1,976	1,896	1,871	963	946
Wages paid (\$1,000)	502,781	577,335	608,620	306,265	315,451
Hourly wages (dollars per hour)	\$31.00	\$34.71	\$35.95	\$35.54	\$37.59
Productivity (tires per 1,000 hours)	839	814	750	780	747
Unit labor costs (dollars per unit)	\$36.96	\$42.66	\$47.96	\$45.58	\$50.32

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

The number of PRWs increased by 10.2 percent from 2021 to 2023 but was 0.8 percent lower in January-June 2024 than in January-June 2023.¹⁹ Total hours worked also increased steadily from 2021 to 2023. The increase in PRWs outpaced the increase in total hours worked, leading to a decrease of 5.3 percent in hours worked per PRW from 2021 to 2023. As total hours worked were slightly (2.6 percent) lower in January-June 2024 relative to January-June 2023, hours worked per PRW were also slightly lower (1.8 percent).

Wages paid increased by 21.1 percent from 2021 to 2023, and were 3.0 percent higher in January-June 2024 compared to January-June 2023. Hourly wages rose from 2021 to 2023 by 16.0 percent, and were 5.8 percent higher in January-June 2024 relative to January-June 2023. Productivity, however, declined by 10.6 percent from 2021 to 2023 and was also 4.2 percent lower in January-June 2024 relative to January-June 2023. As wages paid and hourly wages increased, while productivity decreased, unit labor costs increased steadily by 29.8 percent from 2021 to 2023, and were 10.4 percent higher in January-June 2024 than in January-June 2023.

¹⁹ *** reported growth in the number of PRWs from 2021 to 2023, with *** reporting the largest growth in PRWs, an increase of *** percent.

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

U.S. importers

The Commission issued importer questionnaires to 76 firms believed to be importers of subject truck and bus tires, as well as to all U.S. producers of truck and bus tires.¹ Usable questionnaire responses were received from 32 companies, representing 66.9 percent of U.S. imports in 2023, including 67.6 percent from Thailand and 66.5 percent from nonsubject sources under HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020. Table IV-1 lists all responding U.S. importers of truck and bus tires from Thailand and other sources, their locations, and their shares of U.S. imports, in 2023.

Table IV-1
Truck and bus tires: U.S. importers, their headquarters, and share of total imports within a given source, 2023

Shares in percent

Firm	Headquarters	Thailand	Canada	China	India	Japan
American Omni Trading	Katy, TX	***	***	***	***	***
American Pacific Industries	Scottsdale, AZ	***	***	***	***	***
American Tire Distributors	Huntersville, NC	***	***	***	***	***
Bridgestone Americas	Nashville, TN	***	***	***	***	***
China Manufacturers Alliance	Monrovia, CA	***	***	***	***	***
Continental Tire	Fort Mill, SC	***	***	***	***	***
Cooper	Akron, OH	***	***	***	***	***
Delta Wholesale	Wood Dale, IL	***	***	***	***	***
Empresas Del Rio Rey	Vega Baja, PR	***	***	***	***	***
Flagship Tire & Wheel	Houston, TX	***	***	***	***	***
Foreign Tire Sales	Union, NJ	***	***	***	***	***
Goodyear	Akron, OH	***	***	***	***	***
Horizon Tire	Irwindale, CA	***	***	***	***	***
Jinyu Tire USA	Las Vegas, NV	***	***	***	***	***
LingLong Americas	Medina, OH	***	***	***	***	***
Michelin NA	Greenville, SC	***	***	***	***	***
NACTR	North Canton, OH	***	***	***	***	***
Omni United	Singapore	***	***	***	***	***

¹ The Commission issued questionnaires to those firms identified in the petition; staff research; and proprietary, Census-edited Customs' import records.

Table IV-1 Continued**Truck and bus tires: U.S. importers, their headquarters, and share of total imports within a given source, 2023**

Shares in percent

Firm	Headquarters	Thailand	Canada	China	India	Japan
Prinx	West Covina, CA	***	***	***	***	***
Staridge	Seattle, WA	***	***	***	***	***
Statewide Tires	West Covina, CA	***	***	***	***	***
Sumitomo Rubber	Rancho Cucamonga, CA	***	***	***	***	***
Sutong Tire	Hockley, TX	***	***	***	***	***
TBC Corporation	Palm Beach Gardens, FL	***	***	***	***	***
Tiger Licensing	Sheridan, WY	***	***	***	***	***
Total Tire	Minnetonka, MN	***	***	***	***	***
Toyo Tire	Costa Mesa, CA	***	***	***	***	***
Tyres International	Stow, OH	***	***	***	***	***
Unicorn Tire	Memphis, TN	***	***	***	***	***
Yokohama Off-Highway Tires	Wakefield, MA	***	***	***	***	***
Yokohama Tire	Santa Ana, CA	***	***	***	***	***
Zafco	Hialeah, FL	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0

Table continued.

Table IV-1 Continued**Truck and bus tires: U.S. importers, their headquarters, and share of total imports within a given source, 2023**

Shares in percent

Firm	Headquarters	South Korea	Vietnam	All other sources	Nonsubject sources	All import sources
American Omni Trading	Katy, TX	***	***	***	***	***
American Pacific Industries	Scottsdale, AZ	***	***	***	***	***
American Tire Distributors	Huntersville, NC	***	***	***	***	***
Bridgestone Americas	Nashville, TN	***	***	***	***	***
China Manufacturers Alliance	Monrovia, CA	***	***	***	***	***
Continental Tire	Fort Mill, SC	***	***	***	***	***
Delta Wholesale	Wood Dale, IL	***	***	***	***	***
Empresas Del Rio Rey	Vega Baja, PR	***	***	***	***	***

Table continued.

Table IV-1 Continued

Truck and bus tires: U.S. importers, their headquarters, and share of total imports within a given source, 2023

Shares in percent

Firm	Headquarters	South Korea	Vietnam	All other sources	Nonsubject sources	All import sources
Flagship Tire & Wheel	Houston, TX	***	***	***	***	***
Foreign Tire Sales	Union, NJ	***	***	***	***	***
Horizon Tire	Irwindale, CA	***	***	***	***	***
Jinyu Tire USA	Las Vegas, NV	***	***	***	***	***
LingLong Americas	Medina, OH	***	***	***	***	***
Michelin NA	Greenville, SC	***	***	***	***	***
NACTR	North Canton, OH	***	***	***	***	***
Omni United	Singapore	***	***	***	***	***
Prinx	West Covina, CA	***	***	***	***	***
Staridge	Seattle, WA	***	***	***	***	***
Statewide Tires	West Covina, CA	***	***	***	***	***
Sumitomo Rubber	Rancho Cucamonga, CA	***	***	***	***	***
Sutong Tire	Hockley, TX	***	***	***	***	***
TBC Corporation	Palm Beach Gardens, FL	***	***	***	***	***
Tiger Licensing	Sheridan, WY	***	***	***	***	***
Total Tire	Minnetonka, MN	***	***	***	***	***
Toyo Tire	Costa Mesa, CA	***	***	***	***	***
Tyres International	Stow, OH	***	***	***	***	***
Unicorn Tire	Memphis, TN	***	***	***	***	***
Yokohama Off-Highway Tires	Wakefield, MA	***	***	***	***	***
Yokohama Tire	Santa Ana, CA	***	***	***	***	***
Zafco	Hialeah, FL	***	***	***	***	***
Goodyear	Akron, OH	***	***	***	***	***
Cooper	Akron, OH	***	***	***	***	***
All firms	Various	---	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. imports

Table IV-2 presents data for U.S. imports of truck and bus tires from Thailand and all other sources.

Table IV-2
Truck and bus tires: U.S. imports by source and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Thailand	Quantity	7,211	10,189	7,126	3,215	4,242
Canada	Quantity	1,542	1,496	1,443	700	790
China	Quantity	1,090	1,765	1,086	599	525
India	Quantity	602	769	475	218	358
Japan	Quantity	1,818	2,490	2,111	1,180	935
South Korea	Quantity	952	1,157	717	435	311
Vietnam	Quantity	1,921	3,020	2,324	969	1,499
All other sources	Quantity	2,399	2,961	2,334	1,261	1,596
Nonsubject sources	Quantity	10,325	13,659	10,489	5,361	6,014
All import sources	Quantity	17,536	23,847	17,616	8,576	10,257
Thailand	Value	1,131,062	1,779,568	1,166,441	584,895	609,957
Canada	Value	458,835	450,994	499,495	217,451	309,044
China	Value	164,954	293,665	203,284	115,889	86,701
India	Value	101,051	145,876	90,601	42,886	65,083
Japan	Value	353,990	619,989	557,011	315,857	225,887
South Korea	Value	202,165	307,703	177,787	108,603	73,719
Vietnam	Value	271,953	472,359	334,212	144,617	203,161
All other sources	Value	546,417	742,914	642,462	366,230	368,202
Nonsubject sources	Value	2,099,365	3,033,501	2,504,853	1,311,533	1,331,797
All import sources	Value	3,230,426	4,813,069	3,671,295	1,896,428	1,941,754
Thailand	Unit value	157	175	164	182	144
Canada	Unit value	298	302	346	311	391
China	Unit value	151	166	187	194	165
India	Unit value	168	190	191	197	182
Japan	Unit value	195	249	264	268	242
South Korea	Unit value	212	266	248	250	237
Vietnam	Unit value	142	156	144	149	136
All other sources	Unit value	228	251	275	290	231
Nonsubject sources	Unit value	203	222	239	245	221
All import sources	Unit value	184	202	208	221	189

Table continued on next page.

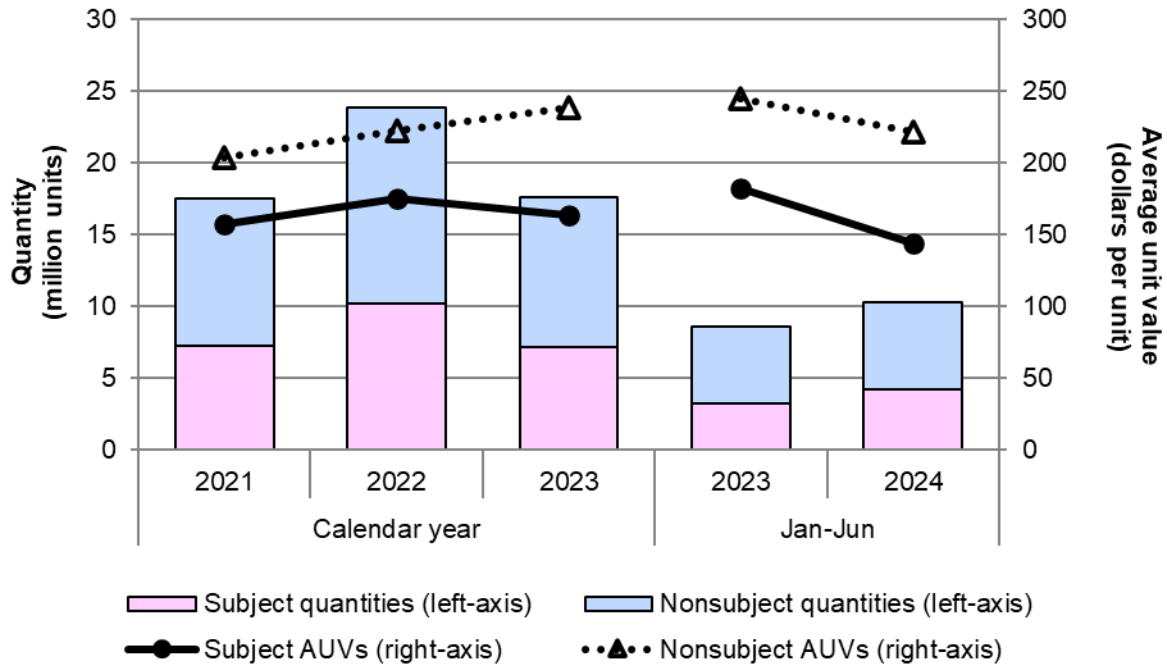
Table IV-2 Continued
Truck and bus tires: Share of U.S. imports by source and period

Unit value in dollars per 1,000 unit; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Thailand	Share of quantity	41.1	42.7	40.5	37.5	41.4
Canada	Share of quantity	8.8	6.3	8.2	8.2	7.7
China	Share of quantity	6.2	7.4	6.2	7.0	5.1
India	Share of quantity	3.4	3.2	2.7	2.5	3.5
Japan	Share of quantity	10.4	10.4	12.0	13.8	9.1
South Korea	Share of quantity	5.4	4.9	4.1	5.1	3.0
Vietnam	Share of quantity	11.0	12.7	13.2	11.3	14.6
All other sources	Share of quantity	13.7	12.4	13.3	14.7	15.6
Nonsubject sources	Share of quantity	58.9	57.3	59.5	62.5	58.6
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Thailand	Share of value	35.0	37.0	31.8	30.8	31.4
Canada	Share of value	14.2	9.4	13.6	11.5	15.9
China	Share of value	5.1	6.1	5.5	6.1	4.5
India	Share of value	3.1	3.0	2.5	2.3	3.4
Japan	Share of value	11.0	12.9	15.2	16.7	11.6
South Korea	Share of value	6.3	6.4	4.8	5.7	3.8
Vietnam	Share of value	8.4	9.8	9.1	7.6	10.5
All other sources	Share of value	16.9	15.4	17.5	19.3	19.0
Nonsubject sources	Share of value	65.0	63.0	68.2	69.2	68.6
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Thailand	Ratio	53.0	75.3	56.2	47.8	67.7
Canada	Ratio	11.3	11.1	11.4	10.4	12.6
China	Ratio	8.0	13.0	8.6	8.9	8.4
India	Ratio	4.4	5.7	3.7	3.2	5.7
Japan	Ratio	13.4	18.4	16.6	17.6	14.9
South Korea	Ratio	7.0	8.6	5.7	6.5	5.0
Vietnam	Ratio	14.1	22.3	18.3	14.4	23.9
All other sources	Ratio	17.6	21.9	18.4	18.8	25.5
Nonsubject sources	Ratio	75.9	100.9	82.7	79.8	95.9
All import sources	Ratio	128.9	176.2	138.8	127.6	163.6

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020, accessed on August 21, 2024. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Figure IV-1
Truck and bus tires: U.S. import quantities and average unit values, by source and period



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020, accessed on August 21, 2024. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

U.S. imports, by quantity, increased by 36.0 percent from 2021 to 2022, then declined by 26.1 percent from 2022 to 2023, for a net increase of 0.5 percent from 2021 to 2023. Imports from all sources were 19.6 percent higher in January-June 2024 than in January-June 2023.

The 2021-23 irregular increase in total imports reflected similar trends in imports from subject and from nonsubject sources, as imports from each source initially rose by 41.3 and 32.3 percent from 2021 to 2022, before declining from 2022 to 2023, for a net increase of 1.6 percent in nonsubject imports, and a 1.2 percent net decline in subject imports from 2021 to 2023. The higher quantity of imports from all sources across the two interim periods was reflected in higher quantities of subject and nonsubject imports, by 32.0 and 12.2 percent, respectively, compared to January-June 2023.

In terms of value, imports from subject and nonsubject sources both increased irregularly from 2021 to 2023, with net increases of 3.1 percent and 19.3 percent, respectively, following initial increases of 57.3 and 44.5 percent from 2021 to 2022. The value of subject and nonsubject imports were just 4.3 percent and 1.5 percent higher in January-June 2024 than in January-June 2023. Consequently, the value of imports from all sources increased by 13.6

percent from 2021 to 2023 and was 2.4 percent higher in January-June 2024 relative to January-June 2023. The share of the value of total imports accounted for by subject imports fluctuated during 2021-23, ending 3.2 percentage points lower in 2023 as compared to 2021, and was 0.6 percentage points higher in January-June 2024 than in January-June 2023, accounting for between 30.8 and 37.0 percent of the value of total imports in any annual or partial period.

The average unit value (“AUV”) of imports from subject sources increased by 11.4 percent from 2021 to 2022, subsequently decreasing from 2022 to 2023, for a net increase of 4.4 percent from 2021 to 2023, while the AUV of nonsubject imports steadily rose by 17.4 percent over the same two-year period. The AUV of both subject and nonsubject imports were lower in January-June 2024 than in January-June 2023. Imports from Thailand had a lower AUV relative to imports from nonsubject sources throughout the period for which data were collected, although subject imports had AUVs often comparable to, and at times higher than, imports from China, India, and Vietnam.

As a ratio to U.S. production, subject imports fluctuated during 2021-23, first peaking in 2022 at 75.3 percent before declining from 2022 to 2023, for a 3.1 percentage point net gain from 2021 to 2023. Subject imports in January-June 2024 were 19.8 percentage points higher than in January-June 2023 as a ratio to U.S. production. Imports from nonsubject sources followed a similar trajectory during 2021-23, with an irregular increase of 6.8 percentage points. Nonsubject imports were 16.1 percentage points higher in January June 2024 relative to the 2023 interim period. The ratio of imports from all sources to U.S. production of truck and bus tires consistently exceeded 100.0 percent, reaching a peak of 176.2 percent in 2022.

Table IV-3 shows U.S. imports of truck and bus tires by U.S. producers and/or their affiliated firms.²

Table IV-3
Truck and bus tires: U.S. imports by U.S. producers and/or affiliated firms, by source and period

Quantity in 1,000 units; ratios in percent (see note)

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Thailand	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	7,035	9,135	6,713	3,803	3,005
Thailand	Ratio	***	***	***	***	***
Canada	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Japan	Ratio	***	***	***	***	***
South Korea	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
All other sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	40.1	38.3	38.1	44.3	29.3

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

Note: The ratios represent the portion of official U.S. import statistics within the specified source that was imported by U.S. producers and/or their affiliates. These ratios are calculated off of data shown in this table (numerators) based on questionnaire data and in table IV-2 (denominators) based on official U.S. import statistics. Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

² ***. U.S. producer questionnaire, section II-7.

The quantity of U.S. producers' imports of truck and bus tires increased by 29.9 percent from 2021 to 2022, then decreased by 26.5 percent from 2022 to 2023. As a ratio to total imports, U.S. producers' imports declined by 2.0 percentage points over the same period. Imports by U.S. producers were 21.0 percent lower in January-June 2024 than in January-June 2023, representing 29.3 percent of total imports in January-June 2024.

Imports from nonsubject sources comprised the majority of U.S. producers' total imports. Import sources included Canada and Japan, as well as China and Vietnam, with additional volumes from India, and from other sources. Nonetheless, Thailand was the largest single source of imports by U.S. producers during 2021-23, and the second-largest single source in January-June 2024.

U.S. producers' imports from Thailand increased from 2021 to 2022, then declined for a two-year irregular increase of *** percent, and were *** percent lower in January-June 2024 than in January-June 2023. U.S. producers' imports of truck and bus tires from Thailand remained between *** percent and *** percent of total imports from Thailand during 2021-23. In January-June 2024, however, U.S. producers' imports from Thailand as a ratio to total imports from Thailand was *** percentage points lower than in January-June 2023.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.³ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.⁴ Imports from Thailand accounted for 39.8 percent of total imports of truck and bus tires by quantity during this period.

³ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

⁴ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Table IV-4

Truck and bus tires: U.S. imports in the twelve-month period preceding the filing of the petition, October 2022 through September 2023

Quantity in 1,000 units; shares in percent

Source of imports	Quantity	Share of quantity
Thailand	7,528	39.8
All other sources	11,407	60.2
All import sources	18,936	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020, accessed on August 21, 2024. Imports are based on the imports for consumption data series.

Critical circumstances

On October 17, 2024, Commerce issued its final determination that “critical circumstances” exist with regard to imports from Thailand of truck and bus tires from Bridgestone Tire Manufacturing (Thailand) Co., Ltd (“Bridgestone (Thailand)”).⁵ In this investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from May 20, 2024, the effective date of Commerce’s preliminary affirmative LTFV determination. Table IV-5 presents these data.

⁵ 89 FR 83636, October 17, 2024, referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

Table IV-5**Truck and bus tires: U.S. imports from Thailand subject to Commerce’s final affirmative critical circumstances determination, by month**

Quantity in 1,000 units

Month	Relation to petition	Quantity
May 2023	Before	***
June 2023	Before	***
July 2023	Before	***
August 2023	Before	***
September 2023	Before	***
October 2023	Before	***
November 2023	After	***
December 2023	After	***
January 2024	After	***
February 2024	After	***
March 2024	After	***
April 2024	After	***

Table continued.

Table IV-5 Continued**Truck and bus tires: U.S. imports from Thailand subject to Commerce’s final affirmative critical circumstances determination, by differing number of months before and after the filing of the petition**

Quantity in 1,000 units; difference in percent

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***
6 months	***	***	***

Source: Compiled from proprietary, Census-edited Customs records using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020, accessed on August 22, 2024. Imports are based on the imports for consumption data series.

Note: In their final AD investigation determination, Commerce found critical circumstances exist with respect to imports of truck and bus tires exported by Bridgestone.

Figure IV-2

Truck and bus tires: U.S. imports from Thailand subject to Commerce's final critical circumstances determination, by month

* * * * *

Source: Compiled from proprietary, Census-edited Customs records using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020, accessed on August 22, 2024. Imports are based on the imports for consumption data series.

Bridgestone Americas consistently reported ***, and *** ending period inventories in any period. Bridgestone ***.⁶

⁶ Email from ***.

Apparent U.S. consumption and market shares

Quantity

Table IV-6 and figure IV-3 present data on apparent U.S. consumption and U.S. market shares by quantity for truck and bus tires.

Table IV-6
Truck and bus tires: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 units; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	12,365	12,317	10,658	5,249	5,279
Thailand	Quantity	7,211	10,189	7,126	3,215	4,242
Canada	Quantity	1,542	1,496	1,443	700	790
China	Quantity	1,090	1,765	1,086	599	525
India	Quantity	602	769	475	218	358
Japan	Quantity	1,818	2,490	2,111	1,180	935
South Korea	Quantity	952	1,157	717	435	311
Vietnam	Quantity	1,921	3,020	2,324	969	1,499
All other sources	Quantity	2,399	2,961	2,334	1,261	1,596
Nonsubject sources	Quantity	10,325	13,659	10,489	5,361	6,014
All import sources	Quantity	17,536	23,847	17,616	8,576	10,257
All sources	Quantity	29,901	36,164	28,274	13,825	15,536
U.S. producers	Share	41.4	34.1	37.7	38.0	34.0
Thailand	Share	24.1	28.2	25.2	23.3	27.3
Canada	Share	5.2	4.1	5.1	5.1	5.1
China	Share	3.6	4.9	3.8	4.3	3.4
India	Share	2.0	2.1	1.7	1.6	2.3
Japan	Share	6.1	6.9	7.5	8.5	6.0
South Korea	Share	3.2	3.2	2.5	3.1	2.0
Vietnam	Share	6.4	8.4	8.2	7.0	9.6
All other sources	Share	8.0	8.2	8.3	9.1	10.3
Nonsubject sources	Share	34.5	37.8	37.1	38.8	38.7
All import sources	Share	58.6	65.9	62.3	62.0	66.0
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires for U.S. producers and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020, accessed on August 21, 2024. Imports are based on the imports for consumption data series.

Figure IV-3
Truck and bus tires: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires for U.S. producers and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020. Imports are based on the imports for consumption data series.

Apparent U.S. consumption of truck and bus tires in the United States, by quantity, increased by 20.9 percent from 2021 to 2022, then declined by 21.8 percent from 2022 to 2023, resulting in a net decrease of 5.4 percent from 2021 to 2023.⁷ Apparent U.S. consumption by quantity was 12.4 percent higher, however, in January-June 2024 than in January-June 2023. The initial increase in apparent U.S. consumption from 2021 to 2022 reflected a 36.0 percent rise in imports during that period, as U.S. producers' U.S. shipments declined steadily during 2021-23. With the exception of imports from Canada, imports from all sources increased from 2021 to 2022, and subsequently imports from all sources then decreased year-on-year from 2022 to 2023. As the quantity of U.S. shipments from all import sources remained essentially flat from 2021 to 2023, the overall decline in apparent U.S. consumption, by quantity, reflected the decline in apparent U.S. consumption reported by U.S. producers during that period.

⁷ The steep increase and subsequent sharp decline in apparent U.S. consumption of truck and bus tires reflect in part changes in importer inventories. The coverage of importer responses was insufficient to use U.S. shipments of imports to calculate apparent U.S. consumption, however those responses do indicate that in 2022, when apparent U.S. consumption increased by approximately 6.3 million tires, reported importer inventories increased by approximately 1.3 million tires. In 2023, when apparent U.S. consumption decreased by approximately 7.9 million tires, reported importer inventories decreased by approximately 1.1 million tires.

The share of apparent U.S. consumption, by quantity, accounted for by U.S. producers decreased from 2021 to 2022, then increased from 2022 to 2023, for an irregular decline of 3.7 percentage points during 2021-23. The drop in market share took place as the quantity of U.S. producers' U.S. shipments steadily declined. Over this same period, the market share accounted for by imports from Thailand increased irregularly by 1.1 percentage points, and in the case of nonsubject sources increased irregularly by 2.6 percentage points. U.S. producers gained market share from 2022 to 2023, despite declining in absolute terms, as imports from Thailand and from nonsubject sources declined, by 30.1 percent and 23.2 percent, respectively, over the same period.

In January-June 2024, despite higher quantities of U.S. shipments relative to January-June 2023, U.S. producers' market share was 4.0 percentage points lower than in January-June 2023. Imports from Thailand and from nonsubject sources were also higher in January-June 2024 than in January-June 2023, by 32.0 and 12.2 percent, respectively. Consequently, the market share accounted for by imports from Thailand was higher in January-June 2024, by 4.1 percentage points, while the market share of imports from nonsubject sources stayed consistent as compared to January-June 2023.

Value

Table IV-7 and figure IV-4 present data on apparent U.S. consumption and U.S. market shares by value for truck and bus tires.

Table IV-7
Truck and bus tires: Apparent U.S. consumption and market shares based on value data, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Value	3,613,367	4,205,736	3,759,373	1,843,387	1,860,963
Thailand	Value	1,131,062	1,779,568	1,166,441	584,895	609,957
Canada	Value	458,835	450,994	499,495	217,451	309,044
China	Value	164,954	293,665	203,284	115,889	86,701
India	Value	101,051	145,876	90,601	42,886	65,083
Japan	Value	353,990	619,989	557,011	315,857	225,887
South Korea	Value	202,165	307,703	177,787	108,603	73,719
Vietnam	Value	271,953	472,359	334,212	144,617	203,161
All other sources	Value	546,417	742,914	642,462	366,230	368,202
Nonsubject sources	Value	2,099,365	3,033,501	2,504,853	1,311,533	1,331,797
All import sources	Value	3,230,426	4,813,069	3,671,295	1,896,428	1,941,754
All sources	Value	6,843,793	9,018,805	7,430,668	3,739,815	3,802,717
U.S. producers	Share	52.8	46.6	50.6	49.3	48.9
Thailand	Share	16.5	19.7	15.7	15.6	16.0
Canada	Share	6.7	5.0	6.7	5.8	8.1
China	Share	2.4	3.3	2.7	3.1	2.3
India	Share	1.5	1.6	1.2	1.1	1.7
Japan	Share	5.2	6.9	7.5	8.4	5.9
South Korea	Share	3.0	3.4	2.4	2.9	1.9
Vietnam	Share	4.0	5.2	4.5	3.9	5.3
All other sources	Share	8.0	8.2	8.6	9.8	9.7
Nonsubject sources	Share	30.7	33.6	33.7	35.1	35.0
All import sources	Share	47.2	53.4	49.4	50.7	51.1
All sources	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires for U.S. producers and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020, accessed on August 21, 2024. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Figure IV-4

Truck and bus tires: Apparent U.S. consumption based on value, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires for U.S. producers and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020. Imports are based on the imports for consumption data series. Value data reflect landed duty-paid values.

Apparent U.S. consumption of truck and bus tires in the United States, by value, initially increased by 31.8 percent from 2021 to 2022, then decreased by 17.6 percent from 2022 to 2023, for an irregular increase of 8.6 percent during 2021-23. The overall trend of an irregular increase during 2021-23 was reflected in the value of U.S. shipments by U.S. producers and from Thailand and from nonsubject sources alike, all of which reported initial increases from 2021 to 2022, followed by declines from 2022 to 2023. In interim January-June 2024, the value of U.S. shipments was higher relative to January-June 2023, by margins of between 1.0 and 4.3 percent, for truck and bus tires from U.S. producers, Thailand, and nonsubject sources.

As the increase in the value of U.S. shipments of imported truck and bus tires from 2021 to 2022 was larger than the simultaneous increase in U.S. producers' U.S. shipments (16.4 percent), U.S. producers' market share declined by 6.2 percentage points from 2021 to 2022, before increasing by 4.0 percentage points in 2023, resulting in a net decline of 2.2 percentage points from 2021 to 2023. The market share of imports of truck and bus tires from Thailand declined by less than 1 percentage point from 2021 to 2023, while imports from nonsubject sources gained 3.0 percentage points of market share, over the same period. As the value of U.S. shipments by U.S. producers, Thailand, and nonsubject sources were all comparably higher in January-June 2024 relative to January-June 2023, market shares stayed relatively stable.

U.S. shipments to OEMs and the aftermarket

Tables IV-8 through IV-10 show U.S. producers' and U.S. importers' U.S. shipments of truck and bus tires by product type (e.g., branded tires of private label tires) and by channel of distribution (e.g., to OEMs or to the aftermarket).

Table IV-8
Truck and bus tires: U.S. producers' and U.S. importers' U.S. shipments of branded product to OEMs, by source and period

Quantity in 1,000 units; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Shipments of branded truck and bus tires to OEMs increased by *** percent from 2021 to 2023, but were *** percent lower in January-June 2024 compared to January-June 2023. U.S. producers comprised the *** of U.S. shipments of branded tires to OEMs in all periods reported, though imports did gain *** percentage points as a share of total U.S.

shipments of branded tires to OEMs from 2021 to 2023, and were then *** percentage points lower in the 2024 interim period relative to the 2023 interim period.

Table IV-9
Truck and bus tires: U.S. producers' and U.S. importers' U.S. shipments of private label product to the aftermarket, by source and period

Quantity in 1,000 units

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
All other source	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. shipments of private label truck and bus tires to the aftermarket initially increased by *** percent from 2021 to 2022, then declined from 2022 to 2023 for a 2021-23 irregular decline of *** percent, and *** across the two interim periods. Imports comprised the *** of U.S. shipments of private label tires to the aftermarket in all periods except interim January-June 2024, the majority of which were comprised of imports from ***. However, U.S. shipments to the aftermarket of private label tires from Thailand did decrease by *** percent from 2021 to 2023.

Table IV-10
Truck and bus tires: U.S. producers' and U.S. importers' U.S. shipments of branded product to the aftermarket, by source and period

Quantity in 1,000 units; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Japan	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
All other sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Canada	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Japan	Share	***	***	***	***	***
South Korea	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
All other sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. shipments of branded truck and bus tires to the aftermarket peaked in 2022, and reported a net decline of *** percent from 2021 to 2023, reflected in declines of *** percent in U.S. shipments by U.S. producers and *** percent in U.S. shipments of imports. This trend continued in the interim periods, as total U.S. shipments of branded tires to the aftermarket were *** percent lower in January-June 2024 relative to January-June 2023. Although U.S. producers' U.S. shipments comprised *** of U.S. shipments of branded tires to the aftermarket in 2021, imports then comprised *** of shipments in all remaining periods.

Part V: Pricing data

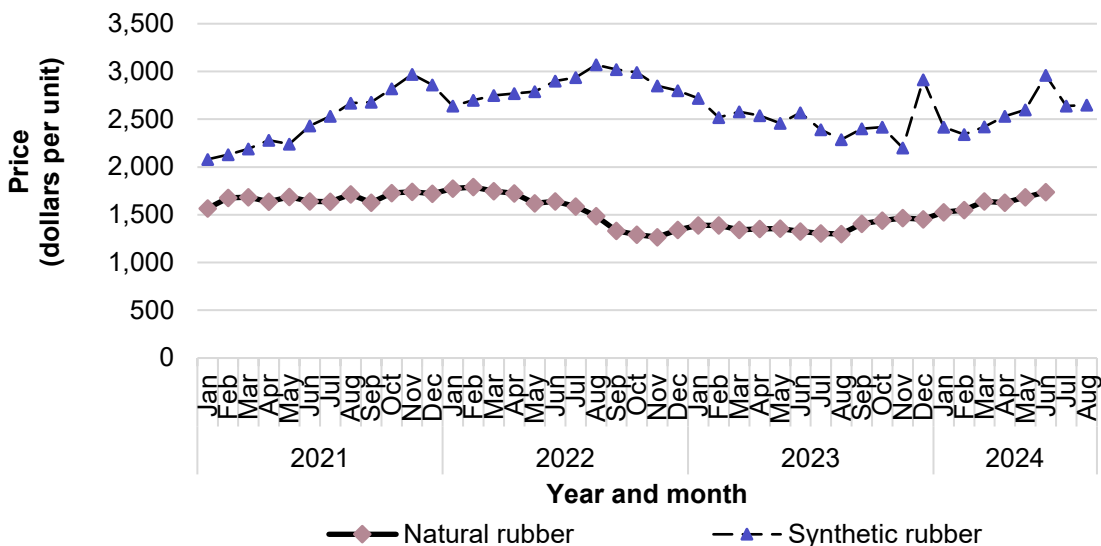
Factors affecting prices

Raw material costs

Truck and bus tires are produced using natural and synthetic rubber, carbon black, oils, and other material inputs. Approximately 45.1 percent of the raw material cost of a tire is rubber, 20.7 percent is carbon black, and 18.9 percent is chemicals and oil. Most responding U.S. producers (5 of 6) and importers (17 of 29) reported that raw material prices have increased (either steadily or with fluctuations) since 2021. The average unit value of U.S. producers' raw materials increased by 29.0 percent from 2021 to 2023 and accounted for 53.3 percent of reported COGS in 2023 (compared to 53.7 percent in 2021).

The prices of both synthetic and natural rubber have fluctuated upward since January 2021. The price of natural rubber increased by 10.9 percent between January 2021 and June 2024 while the price of synthetic rubber increased by 42.3 percent between January 2021 and June 2024 (figure V-1 and tables V-1 and V-2).

Figure V-1
Raw materials: Rubber prices for natural rubber on the Singapore exchange and synthetic rubber (U.S. styrene-butadiene rubber), by month, January 2021 to August 2024



Sources: Technically Specified Natural Rubber (TSR), Singapore Exchange (SGX), Rubber Statistical Bulletin, International Rubber Study Group (IRSG), Singapore, Quarterly Issues; and Rubber Statistical Bulletin, International Rubber Study Group (IRSG), Singapore, Quarterly issues. Retrieved August 22, 2024. USITC DataWeb, U.S. SBR Exports, HTS 4002.19, retrieved October 11, 2024.

Table V-1**Raw materials: Rubber prices for natural rubber on the Singapore exchange, by month, January 2021 to June 2024**

Prices in dollars per metric ton

Month	2021	2022	2023	2024
January	1,567	1,773	1,389	1,527
February	1,679	1,790	1,388	1,551
March	1,683	1,746	1,341	1,641
April	1,638	1,724	1,352	1,627
May	1,686	1,619	1,356	1,684
June	1,640	1,639	1,325	1,738
July	1,637	1,588	1,306	NA
August	1,715	1,486	1,299	NA
September	1,626	1,331	1,406	NA
October	1,729	1,293	1,441	NA
November	1,742	1,266	1,465	NA
December	1,719	1,344	1,453	NA

Sources: Technically Specified Natural Rubber (TSR), Singapore Exchange (SGX), Rubber Statistical Bulletin, International Rubber Study Group (IRSG), Singapore, Quarterly Issues. and Rubber Statistical Bulletin, International Rubber Study Group (IRSG), Singapore, Quarterly issues. Retrieved August 22, 2024.

Table V-2**Raw materials: Rubber prices synthetic rubber (U.S. styrene-butadiene rubber), by month, January 2021 to August 2024**

Prices in dollars per metric ton

Month	2021	2022	2023	2024
January	2,080	2,640	2,719	2,418
February	2,130	2,700	2,517	2,339
March	2,190	2,750	2,577	2,420
April	2,280	2,770	2,538	2,530
May	2,240	2,790	2,458	2,600
June	2,430	2,900	2,570	2,960
July	2,530	2,937	2,391	2,640
August	2,670	3,070	2,288	2,650
September	2,680	3,020	2,401	NA
October	2,820	2,990	2,416	NA
November	2,970	2,850	2,199	NA
December	2,860	2,800	2,914	NA

Sources: USITC DataWeb, U.S. SBR Exports, HTS 4002.19, retrieved October 11, 2024.

Transportation costs to the U.S. market

Transportation costs for truck and bus tires shipped from Thailand to the United States averaged 7.6 percent during 2023. These estimates were derived from official import data and represent the transportation and other charges on imports.¹

U.S. inland transportation costs

Four of 6 responding U.S. producers and 29 of 30 responding importers reported that they typically arrange transportation to their customers. Most responding U.S. producers reported that their U.S. inland transportation costs ranged from 5 to 14 percent while most importers reported costs of 1 to 11 percent.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, price lists, and *** (table V-3). Price lists are the most common price setting method for the importers.

Table V-3
Truck and bus tires: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	U.S. importers
Transaction-by-transaction	4	12
Contract	3	6
Set price list	4	26
Other	1	0
Responding firms	6	32

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

U.S. producers reported selling most of their truck and bus tires under long-term contracts in both OEM and aftermarket sales (table V-4). Importers also reported making most of their OEM sales under long-term contracts but most of their aftermarket sales were spot sales.

¹ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2023 and then dividing by the customs value based on the HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020.

Table V-4
Truck and bus tires: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2023

Share in percent

Item	U.S. producers: OEM	U.S. producers: Aftermarket	U.S. producers: All channels	U.S. importers: OEM	U.S. importers: Aftermarket	U.S. importers: All channels
Long-term contracts	***	***	***	***	***	***
Annual contracts	***	***	***	***	***	***
Short-term contracts	***	***	***	***	***	***
Spot sales	***	***	***	***	***	***
Total	100.0	100.0	100.0	100.0	100.0	100.0

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

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

Most U.S. producers reported that long-term contracts for OEMs do not allow price renegotiations during the contract, fix both price and quantity, and are indexed to raw material costs. Most U.S. producers reported that long-term contracts for aftermarket sales do not allow price renegotiations and are not indexed to raw material costs. Nine importers provided information on their short-term aftermarket contacts; most did not allow price renegotiations, fixed the price, and are not indexed to raw materials.²

² One importer (***) reported contract conditions for long-term contracts to OEMs. The firm's contracts did not allow price renegotiation, fixed price and quantity, and were not indexed to raw materials. Two importers reported the contract conditions for one-year contracts to the aftermarket; both fixed price and were not indexed to raw material costs. Three importers reported the contract conditions for long-term contracts to the aftermarket; most allowed price renegotiation, fix price and quantity, and were not indexed to raw materials.

Sales terms and discounts

Most U.S. producers and most importers report one or more type of discount. Most producers (4 of 6) offer quantity and total volume discounts (5), while one reported no discount policy. Half or more importers offer quantity discounts (16 of 32) and total volume (19) discounts, 6 reported no discount policy, and 7 reported other discounts including annual total dollars discount, case by case/customer specific discounts, promotional discounts, seasonal pricing, and freight discounts (truck load discounts).

Price leadership

Most purchasers (16 of 25 responding) reported that there were price leaders in the truck and bus tires market. Fifteen purchasers listed one or more firms who, in their opinion, were price leaders.³ Ten reported that Bridgestone was a price leader, eight reported that Michelin was a leader, six reported that Goodyear was a leader, four reported that Continental was a leader, two each reported Hankook and Double Coin were price leaders, and five firms each identified another firm as price leader (Delta Wholesale Tire, Prinx, Firestone, Southern Tire Mart, Toyo, and Yokohama). Purchasers indicating the presence of price leaders typically reported reasons the tier 1 brands are price leaders, including:

- Tier 1 brands initiate price changes that are followed by lower tiers prices, as a result, tier 1 brands determine the direction of price changes;
- Tier 1 brands provide the price ceiling based on tire performance, features, warranty, and milage;
- Firms led by providing highest price quotes without considering the market;
- These firms are able to change prices as needed;
- These firms supply the largest fleets; and
- Bridgestone is a worldwide distributor.⁴

³ One purchaser considered all brands as price leaders.

⁴ Prinx and Southern Tire Mart were reported to be price leaders because of their low prices.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following truck and bus tires products shipped to unrelated U.S. customers during January 2021 to June 2024. Prices were collected separately for sales to OEMs and to the aftermarket.

Product 1.-- Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph).

Product 2.-- Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph).

Product 3.-- Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph).

Product 4.-- Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

Four U.S. producers (***) and 23 importers provided usable pricing data for sales of the requested products produced in Thailand, and 25 for all import sources, although not all firms reported pricing for all products for all quarters.⁵ Pricing data reported by these firms accounted for approximately one fifth of U.S. producers' U.S. commercial shipments of truck and bus tires. Pricing data reported by the responding importers accounted for approximately one quarter of U.S. commercial shipments of all imports of truck and bus tires from Thailand in 2023.⁶

Price data for products 1-4 for sales to OEMs and to the aftermarket are presented in tables V-5 to V-8 and figures V-2 to V-5.

Nonsubject sources (China and Vietnam) prices are presented in Appendix F.

⁵ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

⁶ Pricing coverage is based on U.S. shipments reported in questionnaires.

Table V-5

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source, type of purchaser, and quarter

Price in dollars per unit, quantity in units, margin in percent

Period	U.S. to OEM price	U.S. to OEM quantity	Thailand to OEM price	Thailand to OEM Quantity	Thailand to OEM margin
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

Period	U.S. to aftermarket price	U.S. to aftermarket quantity	Thailand to aftermarket price	Thailand to aftermarket quantity	Thailand to aftermarket margin
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

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

Note: Product 1: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph).

Table V-6

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source, type of purchaser, and quarter

Price in dollars per unit, quantity in units, margin in percent

Period	U.S. to OEM price	U.S. to OEM quantity	Thailand to OEM price	Thailand to OEM quantity	Thailand to OEM margin
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

Period	U.S. to aftermarket price	U.S. to aftermarket quantity	Thailand to aftermarket price	Thailand to aftermarket quantity	Thailand to aftermarket margin
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

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

Note: Product 2: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph).

Table V-7

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source, type of purchaser, and quarter

Price in dollars per unit, quantity in units, margin in percent

Period	U.S. to OEM price	U.S. to OEM quantity	Thailand to OEM price	Thailand to OEM quantity	Thailand to OEM margin
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

Period	U.S. to aftermarket price	U.S. to aftermarket quantity	Thailand to aftermarket price	Thailand to aftermarket quantity	Thailand to aftermarket margin
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

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

Note: Product 3: Truck and bus tire, tires designated for drive application (excluding I-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph).

Table V-8

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source, type of purchaser, and quarter

Price in dollars per unit, quantity in units, margin in percent

Period	U.S. to OEM price	U.S. to OEM quantity	Thailand to OEM price	Thailand to OEM quantity	Thailand to OEM margin
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

Period	U.S. to aftermarket price	U.S. to aftermarket quantity	Thailand to aftermarket price	Thailand to aftermarket quantity	Thailand to aftermarket margin
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

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

Note: Product 4: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

Figure V-2

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 sold to OEM, by source, and quarter

Price of product 1 to OEM

* * * * *

Volume of product 1 to OEM

* * * * *

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

Note: Product 1: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph).

Figure V-3

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 sold to aftermarket, by source, and quarter

Price of product 1 to aftermarket

* * * * *

Volume of product 1 to aftermarket

* * * * *

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

Note: Product 1: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph).

Figure V-4

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 sold to OEM, by source, and quarter

Price of product 2 to OEM

* * * * *

Volume of product 2 to OEM

* * * * *

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

Note: Product 2: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph).

Figure V-5

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 sold to aftermarket, by source, and quarter

Price of product 2 to aftermarket

* * * * *

Volume of product 2 to aftermarket

* * * * *

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

Note: Product 2: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph).

Figure V-6

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 to OEM, by source, and quarter

Price of product 3 to OEM

* * * * *

Volume of product 3 to OEM

* * * * *

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

Note: Product 3: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph).

Figure V-7

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 to aftermarket, by source, and quarter

Price of product 3 to aftermarket

* * * * *

Volume of product 3 to aftermarket

* * * * *

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

Note: Product 3: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph).

Figure V-8

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 to OEM, by source, and quarter

Price of product 4 to OEM

* * * * *

Volume of product 4 to OEM

* * * * *

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

Note: Product 4: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

Figure V-9

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 to aftermarket, by source, and quarter

Price of product 4 to aftermarket

* * * * *

Volume of product 4 to aftermarket

* * * * *

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

Note: Product 4: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

Price trends

In general, prices increased during January 2021 to June 2024. Table V-9 summarizes the price trends, for the United States and Thailand, by channel, and by product. As shown in the table, domestic price increases ranged from *** to *** percent during January 2021 to June 2024. The Thailand imports price increases ranged from *** to *** percent while Thailand import prices decreases ranged from *** to *** percent.

Table V-9
Truck and bus tires: Summary of price data, by product and source, January 2021-June 2024

Quantity in units, price in dollars per unit, change in percent

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Change in price over period
Product 1: OEM	United States	14	***	***	***	***	***	***
Product 1: OEM	Thailand	11	***	***	***	***	***	***
Product 1: aftermarket	United States	14	***	***	***	***	***	***
Product 1: aftermarket	Thailand	14	***	***	***	***	***	***
Product 2: OEM	United States	14	***	***	***	***	***	***
Product 2: OEM	Thailand	1	***	***	***	***	***	***
Product 2: aftermarket	United States	14	***	***	***	***	***	***
Product 2: aftermarket	Thailand	14	***	***	***	***	***	***
Product 3: OEM	United States	14	***	***	***	***	***	***
Product 3: OEM	Thailand	14	***	***	***	***	***	***
Product 3: aftermarket	United States	14	***	***	***	***	***	***
Product 3: aftermarket	Thailand	14	***	***	***	***	***	***
Product 4: OEM	United States	14	***	***	***	***	***	***
Product 4: OEM	Thailand	0	***	***	***	***	***	***
Product 4: aftermarket	United States	14	***	***	***	***	***	***
Product 4: aftermarket	Thailand	14	***	***	***	***	***	***

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

Note: Percent change column is percentage change from the first quarter 2021 to the second quarter in 2024.

Price comparisons

As shown in tables V-10 to V-11, prices for product imported from Thailand producers were below those for U.S.-produced product in all 82 instances (***) tires); margins of underselling ranged from 0.3 to 66.5 percent. There were no instances of overselling.

Table V-10
Truck and bus tires: Instances of Thailand underselling and the range and average of margins, by product and purchaser type

Quantity in units; margin in percent

Product	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1: OEM	11	***	***	***	***
Product 2: OEM	1	***	***	***	***
Product 3: OEM	14	***	***	***	***
Product 4: OEM	0	---	---	---	---
All OEM products	26	***	***	***	***
Product 1: Aftermarket	14	***	***	***	***
Product 2: Aftermarket	14	***	***	***	***
Product 3: Aftermarket	14	***	***	***	***
Product 4: Aftermarket	14	***	***	***	***
All aftermarket products	56	***	***	***	***
Total all market and products	82	6,503,882	32.7	0.3	66.5

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

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

Note: Only *** reported price data for sales of truck and bus tires from Thailand to OEMs. The OEM price data specific to product 2 from Thailand were reported ***, which reported selling *** brand, which it characterized as “***.”

Table V-11
Truck and bus tires: Instances of Thailand underselling and the range and average of margins, by period

Quantity in units; margin in percent

Period	Number of quarters	Quantity	Average margin	Min margin	Max margin
2021	24	2,196,902	26.4	2.7	52.2
2022	24	2,424,929	28.1	8.7	55.0
2023	21	1,255,289	40.0	0.3	64.0
January-June 2024	13	626,762	40.9	13.5	66.5
All periods	82	6,503,882	32.7	0.3	66.5

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

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

Lost sales and lost revenue

In the preliminary phase of the investigation, the Commission requested that U.S. producers of truck and bus tires report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of truck and bus tires from Thailand during January 2020-June 2023. One U.S. producer submitted lost sales and lost revenue allegations. It identified 19 firms with which it lost sales or revenue (all 19 consisting of both types of allegations). All were reported to have occurred in 2021 and 2022.

In the final phase of the investigation, of the six responding U.S. producers, three reported that they had to either reduce prices or roll back announced price increases, and three U.S. producers reported that they had lost sales.

Staff contacted 107 purchasers and received responses from 26 purchasers. Responding purchasers reported purchasing 47.1 million tires of truck and bus tires during January 2021 to June 2024 (table V-12).

Table V-12

Truck and bus tires: Purchasers' reported purchases and imports, by firm and source

Quantity in 1,000 units, Change in shares in percentage points

Purchaser	Domestic quantity	Thailand quantity	All other quantity	Change in domestic share	Change in Thailand share
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
All firms	14,079	10,302	22,681	1.6	(1.3)

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

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or Thailand imports between 2021 and 2023.

Of the 26 responding purchasers, six reported that, since 2021, they had purchased imported truck and bus tires produced in Thailand instead of U.S.-produced product. Five of these purchasers reported that Thailand import prices were lower than U.S.-produced product, and two of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Two purchasers estimated the quantity (***) of truck and bus tires from Thailand purchased instead of domestic product (table V-13). Purchasers identified non-price reasons for purchasing imported rather than U.S.-produced product. Nonprice reasons included: availability, supplier shifting source for China to Thailand, customer choice, reliability, lead time, and the U.S. producers lack of interest in selling to wholesalers that service the independent channel.

Table V-13
Truck and bus tires: Purchasers' responses to purchasing imports from Thailand instead of domestic product, by firm

Quantity in 1,000 units

Purchaser	Purchased Thailand imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table V-13 Continued

Truck and bus tires: Purchasers' responses to purchasing Thailand imports instead of domestic product, by firm

Quantity in 1,000 units

Purchaser	Purchased Thailand imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	Yes--6; No--20	Yes--5; No--1	Yes--2; No--4	***	NA

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

Of the 20 responding purchasers, two purchasers (***) reported that U.S. producers had reduced prices in order to compete with lower-priced imports from Thailand. Six reported that they did not know. *** estimated price reductions ranged from *** percent.

Part VI: Financial experience of U.S. producers

Background¹

Bridgestone Americas, Continental Tire, Goodyear, Michelin NA, Specialty Tires, Sumitomo Rubber, and Yokohama Tire provided usable financial results on their truck and bus tires operations based on a fiscal year ending December 31.² *** provided their financial data on the basis of GAAP, while *** reported their financial results on an IFRS basis. The net sales of truck and bus tires, by quantity, consisted of commercial sales (*** percent), transfers to related firms (*** percent), lease sales (*** percent), and internal consumption (*** percent) in 2023.³

Figure VI-1 presents each responding firm's share of the total reported net sales quantity in 2023.

¹ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), international financial reporting standards ("IFRS"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), fair market value ("FMV"), and return on assets ("ROA").

² Commission staff verified the questionnaire response of ***. Data changes have been incorporated into this section of the report.

³ All U.S. producers except *** reported transfers to related firms while ***. U.S. producers' questionnaire responses of ***, question II-12. *** is the only firm which reported internal consumption and *** reported lease sales.

Figure VI-1
Truck and bus tires: U.S. producers' share of net sales quantity in 2023, by firm

* * * * *

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

Operations on truck and bus tires

Table VI-1 presents aggregated data on U.S. producers' operations in relation to truck and bus tires, while table VI-2 presents corresponding changes in AUVs. Table VI-3 presents selected company-specific financial data.

Table VI-1
Truck and bus tires: U.S. producers' results of operations, by item and period

Quantity in 1,000 units; value in 1,000 dollars; ratios in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Commercial sales	Quantity	10,749	10,623	9,226	4,607	4,756
Lease sales	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Total net sales	Quantity	13,406	13,236	11,536	5,685	5,733
Commercial sales	Value	2,992,419	3,469,222	3,115,952	1,544,165	1,621,195
Lease sales	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Total net sales	Value	3,889,882	4,493,417	4,030,807	1,977,364	2,002,181
COGS: Raw materials	Value	1,570,486	1,931,289	1,743,925	833,401	825,137
COGS: Direct labor	Value	608,596	670,394	697,928	333,831	368,916
COGS: Other factory	Value	747,455	829,286	827,107	404,994	415,654
COGS: Total	Value	2,926,537	3,430,969	3,268,960	1,572,226	1,609,707
Gross profit or (loss)	Value	963,345	1,062,448	761,847	405,138	392,474
SG&A expenses	Value	417,147	454,170	459,463	222,086	258,523
Operating income or (loss)	Value	546,198	608,278	302,384	183,052	133,951
Other expense (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	164,833	163,662	156,729	79,115	80,464
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	40.4	43.0	43.3	42.1	41.2
COGS: Direct labor	Ratio to NS	15.6	14.9	17.3	16.9	18.4
COGS: Other factory	Ratio to NS	19.2	18.5	20.5	20.5	20.8
COGS: Total	Ratio to NS	75.2	76.4	81.1	79.5	80.4
Gross profit	Ratio to NS	24.8	23.6	18.9	20.5	19.6
SG&A expense	Ratio to NS	10.7	10.1	11.4	11.2	12.9
Operating income or (loss)	Ratio to NS	14.0	13.5	7.5	9.3	6.7
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table VI-1 Continued**Truck and bus tires: U.S. producers' results of operations, by item and period**

Shares in percent; unit values in dollars per unit; count in number of firms reporting

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
COGS: Raw materials	Share of COGS	53.7	56.3	53.3	53.0	51.3
COGS: Direct labor	Share of COGS	20.8	19.5	21.4	21.2	22.9
COGS: Other factory	Share of COGS	25.5	24.2	25.3	25.8	25.8
COGS: Total	Share of COGS	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	278	327	338	335	341
Lease sales	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
Total net sales	Unit value	290	339	349	348	349
COGS: Raw materials	Unit value	117	146	151	147	144
COGS: Direct labor	Unit value	45	51	61	59	64
COGS: Other factory	Unit value	56	63	72	71	73
COGS: Total	Unit value	218	259	283	277	281
Gross profit or (loss)	Unit value	72	80	66	71	68
SG&A expenses	Unit value	31	34	40	39	45
Operating income or (loss)	Unit value	41	46	26	32	23
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	3	2	2	2	2
Net losses	Count	2	2	2	2	2
Data	Count	7	7	7	7	7

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

Table VI-2
Truck and bus tires: Changes in AUVs between comparison periods

Changes in percent

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Commercial sales	▲21.3	▲17.3	▲3.4	▲1.7
Lease sales	***	***	***	***
Internal consumption	***	***	***	***
Transfers to related firms	***	***	***	***
Total net sales	▲20.4	▲17.0	▲2.9	▲0.4
COGS: Raw materials	▲29.0	▲24.6	▲3.6	▼(1.8)
COGS: Direct labor	▲33.3	▲11.6	▲19.4	▲9.6
COGS: Other factory	▲28.6	▲12.4	▲14.4	▲1.8
COGS: Total	▲29.8	▲18.7	▲9.3	▲1.5

Table continued.

Table VI-2 Continued
Truck and bus tires: Changes in AUVs between comparison periods

Changes in dollars per unit

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Commercial sales	▲59	▲48	▲11	▲6
Lease sales	***	***	***	***
Internal consumption	***	***	***	***
Transfers to related firms	***	***	***	***
Total net sales	▲59	▲49	▲10	▲1
COGS: Raw materials	▲34	▲29	▲5	▼(3)
COGS: Direct labor	▲15	▲5	▲10	▲6
COGS: Other factory	▲16	▲7	▲9	▲1
COGS: Total	▲65	▲41	▲24	▲4
Gross profit or (loss)	▼(6)	▲8	▼(14)	▼(3)
SG&A expense	▲9	▲3	▲6	▲6
Operating income or (loss)	▼(15)	▲5	▼(20)	▼(9)
Net income or (loss)	***	***	***	***

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

Note: Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table VI-3
Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	13,406	13,236	11,536	5,685	5,733

Table continued.

Table VI-3 Continued
Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	3,889,882	4,493,417	4,030,807	1,977,364	2,002,181

Table continued.

Table VI-3 Continued
Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	2,926,537	3,430,969	3,268,960	1,572,226	1,609,707

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Gross profit or (loss)**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	963,345	1,062,448	761,847	405,138	392,474

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****SG&A expenses**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	417,147	454,170	459,463	222,086	258,523

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Operating income or (loss)**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	546,198	608,278	302,384	183,052	133,951

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net income or (loss)**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****COGS to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	75.2	76.4	81.1	79.5	80.4

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Gross profit or (loss) to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	24.8	23.6	18.9	20.5	19.6

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****SG&A expenses to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	10.7	10.1	11.4	11.2	12.9

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Operating income or (loss) to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	14.0	13.5	7.5	9.3	6.7

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net income or (loss) to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit net sales value**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	290	339	349	348	349

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit raw material costs**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	117	146	151	147	144

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit direct labor costs**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	45	51	61	59	64

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit other factory costs**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	56	63	72	71	73

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit COGS**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	218	259	283	277	281

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit gross profit or (loss)**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	72	80	66	71	68

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit SG&A expenses**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	31	34	40	39	45

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit operating income or (loss)**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	41	46	26	32	23

Table continued.

Table VI-3 Continued**Truck and bus tires: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit net income or (loss)**

Unit values in dollars per unit

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	***	***	***	***	***

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

Net sales

Total net sales quantity declined by 13.9 percent while total net sales value increased irregularly by 3.6 percent from 2021 to 2023. Both total net sales quantity and value were higher in January-June 2024 than in January-June 2023.⁴ ⁵ As shown in table VI-3, *** accounted for most of the decline in total net sales quantity from 2021 to 2023. *** also reported a declining net sales quantity in the same period. All firms except *** reported an overall increasing net sales value from 2021 to 2023. *** are the only two firm which reported lower net sales quantity and value in January-June 2024 than in January-June 2023.

The average unit sales value increased from \$290 in 2021 to \$349 in 2023 and was slightly higher in January-June 2024 (\$349) than in January-June 2023 (\$348). The average unit sales value of all firms except *** increased overall from 2021 to 2023 and four firms (***) reported higher unit sales value in January-June 2024 than in January-June 2023.

Cost of goods sold and gross profit or loss

As shown in table VI-1, raw materials represent the single largest component of total COGS and ranged from 51.3 percent of total COGS in January-June 2024 to 56.3 percent of total COGS in 2022. Per-unit raw material costs increased from \$117 in 2021 to \$151 in 2023 but were lower in January-June 2024 (\$144) than in January-June 2023 (\$147). As shown in table VI-3, all firms except *** reported overall increasing per-unit raw material costs from 2021 to 2023 and all firms except *** reported lower per-unit raw material costs in January-June 2024 than in January-June 2023. As a ratio to net sales, raw material costs increased from 2021 to 2023 but were lower in January-June 2024 than in January-June 2023.

⁴ The Commission's questionnaire requested data on sales of mounted tires that were included in the overall sales data in 2023. One firm, ***, provided data pursuant to that request, and reported **. U.S. producers' questionnaire response of ***, question III-9f. Compared with the data shown in table VI-1, the reported data on mounted tires represent a small portion of total industry sales, costs, and operating income.

⁵ Three firms, ***, provided information on their lease sales. **. U.S. producers' questionnaire responses of ***, question III-9g.

Raw materials consisted of natural and/or synthetic rubber, carbon black, chemicals and oil, bead and belt wire, and other material inputs. The “other material inputs” category included ***. Table VI-4 presents raw materials, by type.⁶

Table VI-4
Truck and bus tires: U.S. producers’ raw material costs in 2023

Value in 1,000 dollars; share of value in percent

Item	Value	Share of value
Rubber (natural and/or synthetic)	786,673	45.1
Carbon black	361,811	20.7
Chemicals and oil	328,880	18.9
Bead and belt wire	216,777	12.4
Other material inputs	49,784	2.9
All raw materials	1,743,925	100.0

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

As a share of total COGS, direct labor costs ranged from 19.5 percent in 2022 to 22.9 percent in January-June 2024, while other factory costs ranged from 24.2 percent in 2022 to 25.8 percent in January-June 2023 and January-June 2024. The average per-unit direct labor costs increased from \$45 in 2021 to \$61 in 2023 and was higher in January-June 2024 (\$64) than in January-June 2023 (\$59). The average per-unit other factory costs also increased from \$56 in 2021 to \$72 in 2023 and was higher in January-June 2024 (\$73) than in January-June 2022 (\$71). As a ratio to net sales, both direct labor costs and other factory costs increased overall from 2021 to 2023 and were higher in January-June 2024 than in January-June 2023.

Total COGS increased overall by 11.7 percent from 2021 to 2023 and was higher in January-June 2024 than in January-June 2023. Per-unit COGS increased from 2021 to 2023 and was higher in January-June 2024 than in January-June 2023. As a ratio to net sales, COGS increased from 75.2 percent in 2021 to 81.1 percent in 2023 and was higher in January-June 2024 (80.4 percent) than in January-June 2023 (79.5 percent). As shown in table VI-3, all firms except *** reported overall increasing total COGS from 2021 to 2023 and all

⁶ Five U.S. producers reported purchasing inputs from related suppliers: ***. U.S. producers’ questionnaire responses of ***, questions III-6 and III-7a.

firms except *** reported higher total COGS in January-June 2024 than in January-June 2023. The average unit COGS of all firms except *** increased from 2021 to 2023 and all firms except *** had higher per-unit COGS in January-June 2024 than in January-June 2023.

Table VI-1 shows that U.S. producers' aggregate gross profits declined irregularly from 2021 to 2023 because the increase in total COGS was greater than the increase in total net sales value. The industry's gross profit was lower in January-June 2024 than in January-June 2023 as the increase in COGS was greater than the increase in net sales value. The gross profit margin (gross profit as a ratio to net sales) declined from 24.8 percent in 2021 to 18.9 percent in 2023, and was lower in January-June 2024 (19.6 percent) than in January-June 2023 (20.5 percent). As shown in table VI-3, *** reported declining gross profit from 2021 to 2023 while all firms except *** reported lower gross profit in January-June 2024 than in January-June 2023. ***.⁷

SG&A expenses and operating income or loss

As shown in table VI-1, the U.S. industry's SG&A expenses increased from 2021 to 2023 and were higher in January-June 2024 than in January-June 2023. The SG&A expenses ratio (i.e., total SG&A expenses divided by net sales) increased irregularly from 10.7 percent in 2021 to 11.4 percent in 2023 and was higher in January-June 2024 (12.9 percent) than in January-June 2023 (11.2 percent). On a per unit basis, SG&A expenses increased from 2021 to 2023 and were higher in January-June 2024 than in January-June 2023. As shown in table VI-3, total SG&A expenses of all firms except *** increased overall between 2021 and 2023, while all firms except *** reported higher SG&A

⁷ ***. Email from ***, September 18, 2024. ***, ***, retrieved October 22, 2024.

expenses in January-June 2024 than in January-June 2023. *** reported an increasing SG&A expense ratio from 2021 to 2023 and *** reported a higher SG&A expense ratio in January-June 2024 than in January-June 2023.⁸ Table VI-5 presents U.S. producers' descriptions of selling and marketing expenses and the manner in which these expenses differ between the OEM and replacement markets.

Table VI-5
Truck and bus tires: U.S. producers' descriptions of selling and marketing expenses, by firm

Firm	Narrative on selling and marketing expenses
Bridgestone Americas	***
Continental Tire	***
Goodyear	***
Michelin NA	***
Specialty Tires	***
Sumitomo Rubber	***
Yokohama Tire	***

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

Table VI-1 shows that U.S. producers' aggregate operating income and operating income margin (operating income divided by total net sales) declined overall from 2021 to 2023 and were lower in January-June 2024 than in January-June 2023. As shown in table VI-3, *** reported overall declining/worsening operating income/loss from 2021 to 2023. The operating income of all firms except *** was lower in January-June 2024 than in January-June 2023. ***.

⁸ ***. U.S. producers' questionnaire response of ***, questions III-10a and III-10b and email from ***, September 10, 2024.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income. In table VI-1, these items are aggregated and only the net amount is shown. Aggregate all other expenses irregularly increased from 2021 to 2023 and were lower in January-June 2024 than in January-June 2023. *** accounted for the vast majority of all other expenses.^{9 10}

As shown in table VI-1, net income and the net income margin (net income as a ratio to net sales) overall declined from 2021 to 2023 and were lower in January-June 2024 than in January-June 2023. As shown in table VI-3, the net income/loss of *** declined/worsened overall from 2021 to 2023. Conversely, the net income/loss of all firms except *** was lower/worse in January-June 2024 than in January-June 2023.

⁹ ***. Email from ***, September 11, 2024.

¹⁰ ***. U.S. producers' questionnaire response of ***, questions III-10a and III-10b and email from ***, September 10, 2024. ***. U.S. producers' questionnaire response of ***, questions III-10a and III-10b.

Variance analysis

A variance analysis for the operations of U.S. producers of truck and bus tires is presented in table VI-6.¹¹ The information for this variance analysis is derived from table VI-1.

Table VI-6
Truck and bus tires: Variance analysis on the operations of U.S. producers between comparison periods

Value in 1,000 dollars

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Net sales price variance	683,524	652,862	114,514	8,122
Net sales volume variance	(542,599)	(49,327)	(577,124)	16,695
Net sales total variance	140,925	603,535	(462,610)	24,817
COGS cost variance	(750,645)	(541,543)	(278,656)	(24,206)
COGS volume variance	408,222	37,111	440,665	(13,275)
COGS total variance	(342,423)	(504,432)	162,009	(37,481)
Gross profit variance	(201,498)	99,103	(300,601)	(12,664)
SG&A cost variance	(100,504)	(42,313)	(63,626)	(34,562)
SG&A volume variance	58,188	5,290	58,333	(1,875)
SG&A total variance	(42,316)	(37,023)	(5,293)	(36,437)
Operating income price variance	683,524	652,862	114,514	8,122
Operating income cost variance	(851,149)	(583,856)	(342,282)	(58,768)
Operating income volume variance	(76,189)	(6,926)	(78,126)	1,546
Operating income total variance	(243,814)	62,080	(305,894)	(49,101)

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

Note: These data are derived from the data in table VI-1. Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

As the data depict, between 2021 and 2023, operating income declined due primarily to an unfavorable net cost/expense variance (unit costs increased) that was greater than a favorable price variance (unit prices increased). Operating income was also lower in January-

¹¹ The Commission's variance analysis is calculated in three parts: Sales variance, cost of sales variance (COGS variance), and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the price variance is from sales; the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances. The overall volume component of the variance analysis is generally small.

June 2024 than in January-June 2023 due primarily to an unfavorable net cost/expense variance that was greater than the favorable price variance.

Capital expenditures and research and development expenses

Table VI-7 presents capital expenditures, by firm, and table VI-9 presents R&D expenses, by firm. Tables VI-8 and VI-10 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

Table VI-7
Truck and bus tires: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	103,752	177,136	330,019	112,793	137,518

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

Note: Shares represent the share of COGS. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table VI-8
Truck and bus tires: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
Bridgestone Americas	***
Continental Tire	***
Goodyear	***
Michelin NA	***
Specialty Tires	***
Sumitomo Rubber	***
Yokohama Tire	***

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

Table VI-9
Truck and bus tires: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Bridgestone Americas	***	***	***	***	***
Continental Tire	***	***	***	***	***
Goodyear	***	***	***	***	***
Michelin NA	***	***	***	***	***
Specialty Tires	***	***	***	***	***
Sumitomo Rubber	***	***	***	***	***
Yokohama Tire	***	***	***	***	***
All firms	83,313	85,854	98,386	44,171	58,260

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Table VI-10
Truck and bus tires: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
Bridgestone Americas	***
Continental Tire	***
Goodyear	***
Michelin NA	***
Specialty Tires	***
Sumitomo Rubber	***
Yokohama Tire	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Assets and return on assets

Table VI-11 presents data on the U.S. producers' total assets while table VI-12 presents their operating ROA.¹² Table VI-13 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time.

Table VI-11
Truck and bus tires: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023
Bridgestone Americas	***	***	***
Continental Tire	***	***	***
Goodyear	***	***	***
Michelin NA	***	***	***
Specialty Tires	***	***	***
Sumitomo Rubber	***	***	***
Yokohama Tire	***	***	***
All firms	2,516,032	2,862,027	3,029,451

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

Table VI-12
Truck and bus tires: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2021	2022	2023
Bridgestone Americas	***	***	***
Continental Tire	***	***	***
Goodyear	***	***	***
Michelin NA	***	***	***
Specialty Tires	***	***	***
Sumitomo Rubber	***	***	***
Yokohama Tire	***	***	***
All firms	21.7	21.3	10.0

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

¹² The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table VI-13

Truck and bus tires: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
Bridgestone Americas	***
Continental Tire	***
Goodyear	***
Michelin NA	***
Specialty Tires	***
Sumitomo Rubber	***
Yokohama Tire	***

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

Capital and investment

The Commission requested U.S. producers of truck and bus tires to describe any actual or potential negative effects of imports of truck and bus tires from Thailand on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-14 presents the number of firms reporting an impact in each category and table VI-15 provides the U.S. producers' narrative responses.

Table VI-14
Truck and bus tires: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2021, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	2
Denial or rejection of investment proposal	Investment	0
Reduction in the size of capital investments	Investment	1
Return on specific investments negatively impacted	Investment	1
Other investment effects	Investment	0
Any negative effects on investment	Investment	3
Rejection of bank loans	Growth	0
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	0
Other growth and development effects	Growth	0
Any negative effects on growth and development	Growth	0
Anticipated negative effects of imports	Future	3

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

Note: ***.

Table VI-15

Truck and bus tires: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2021, by firm and effect

Item	Firm name and narrative on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Return on specific investments negatively impacted	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

The Commission's questionnaire requested companies to describe the effect of the COVID-19 pandemic or government actions to contain the spread of the COVID-19 virus on the firm's financial performance since January 1, 2021. Industry responses are in table VI-16.

Table VI-16

Truck and bus tires: U.S. producers' reported effect of COVID-19 on financial performance

Firm	Narrative on assets
Bridgestone Americas	***
Continental Tire	***
Goodyear	***
Michelin NA	***
Specialty Tires	***
Sumitomo Rubber	***
Yokohama Tire	***

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

Part VII: Threat considerations and information on nonsubject countries

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

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

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

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

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

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

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

The industry in Thailand

The Commission issued foreign producers' or exporters' questionnaires to 19 firms believed to produce and/or export truck and bus tires from Thailand.³ Usable responses to the Commission's questionnaire were received from six producers of truck and bus tires in Thailand: Bridgestone Tire Manufacturing (Thailand) Co., Ltd ("Bridgestone (Thailand)"), Deestone Corporation Public Company Limited ("Deestone"), Huayi Group (Thailand) Company Limited ("Huayi Group"), Otani Radial Company Limited ("Otani"), and Yokohama Tire Manufacturing (Thailand) Co., Ltd ("Yokohama (Thailand)"), as well as from Prinx Chengshan Tire (Thailand) Co., Ltd. ("Prinx Chengshan"). These firms' exports to the United States accounted for approximately *** percent of U.S. imports of truck and bus tires from Thailand in 2023. According to estimates requested of the responding producers in Thailand, the production of truck and bus tires in Thailand reported in questionnaires accounts for approximately *** percent of overall production of truck and bus tires in Thailand. Table VII-1 presents information on the truck and bus tire operations of the responding producers and exporters in Thailand.⁴

Table VII-1
Truck and bus tires: Summary data for subject producers in Thailand, by firm, 2023

Producers	Production (1,000 units)	Share of reported production (percent)	Exports to the United States (1,000 units)	Share of reported exports to the United States (percent)	Total shipments (1,000 units)	Share of firm's total shipments exported to the United States (percent)
Bridgestone (Thailand)	***	***	***	***	***	***
Deestone	***	***	***	***	***	***
Huayi Group	***	***	***	***	***	***
Otani	***	***	***	***	***	***
Prinx Chengshan	***	***	***	***	***	***
Yokohama (Thailand)	***	***	***	***	***	***
All individual producers	8,105	100.0	3,622	100.0	8,082	44.8

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

³ These firms were identified through a review of information submitted in the petition and presented in third-party sources.

⁴ As Michelin Siam Co. Ltd., submitted a foreign producer/exporter questionnaire response in the preliminary phase of this investigation, but did not submit a questionnaire response in the final phase, aggregate foreign producer/exporter questionnaire response data cannot be presented publicly for 2021, 2022, and January-June 2023.

Table VII-2 presents events in Thailand’s industry since January 1, 2021.

Table VII-2
Truck and bus tires: Important industry events in Thailand since January 1, 2021

Date	Firm	Event
June 2021	ZC Rubber	Expansion delay, pandemic affect/supply chain disruptions.
August 2022	General Science	Full ramp-up of \$200 million truck and bus tire plant commercial production.
October 2023	Bridgestone (Thailand)	Closure of Thai Rangsit truck and bus tire plant.
March 2024	Michelin	Michelin is reported to plan an investment of some 300 million euros for capacity expansions over the next 3 years. In addition to truck and bus tires, Michelin also produces substantial volumes of PVLTs, aircraft and motorcycle tires.
April 2024	Prinx Chengshan	Phase III implementation of a semi-steel consumer radial tire expansion of 2 million tires annually.
June 2024	Prinx Chengshan North America (PCNA)	PCNA truck and bus tire business in first-half 2024 was reported as slower than in the consumer tire sector for Prinx and Fortune tire brands due to consumer supply uncertainties. A U.S. warehouse was thought to be needed in the next 12 months to supply customer demand for the current 640 SKUs in all tire categories, and an additional 360 SKUs by yearend 2024, along with a 25 percent increase in its consumer tire plant capacity, together with other tire growth priorities. Dealers have grown from 11 to 54 and PCNA is also exploring OEM markets for its quality value-tier products. PCNA tire products are said to satisfy the requirements of some 95 percent of all vehicles on the road, and consumers have shown preferences for the favorable economics of quality value-tier products since the pandemic.
July 2024	General Science	Commissioning of Phase II project at Rayong designed to produce 10 million semi-steel, PVLT tires annually. Previous plans for 500,000 annual truck and bus tire capacity cancelled.

Source: General Science, Tire Business, <https://www.tirebusiness.com/news/mid-year-report-zc-rubber-pauses-expansion-amid-uncertainty>, June 9, 2021. Rubber News, <https://www.rubbernews.com/tire/general-science-start-production-new-cambodia-plant#>, August 29, 2022. Thai Bridgestone Co., Bangkok, <https://www.bridgestone.co.th/en/media-centre/press-release/2023/official-notification-stop-tire-manufacturing-operations-at-rangsit-plant>, October 27, 2023. Petitioner prehearing brief, exhibit I, <https://www.businesstimes.com.sg/companies-markets/tyre-maker-michelin-invest-300-million-euros-thailand>, March 8, 2024. Prinx Chengshan 2023 Financial Results, <https://en.prinxchengshan.com/index.php?id=5430>, April 1, 2024. Prinx Chengshan, MTD, <https://www.moderntiredealer.com/suppliers/article/55057982/mtd-mid-year-qa-prinx-president-previews-growth-plans>, June 17, 2024. General Science, <https://rubberjournalasia.com/general-science-opens-chinese-thai-tyre-plants/>, July 10, 2024.

Changes in operations

Producers in Thailand were asked to report any change in the character of their operations or organization relating to the production of truck and bus tires since 2021. Four of six producers indicated in their questionnaires that they had experienced such changes. Table VII-3 presents the changes identified by these producers.

Table VII-3
Truck and bus tires: Reported changes in operations for producers in Thailand since January 1, 2021, by reported change category and firm

Item	Firm name and accompanying narrative response regarding changes in operations
Plant closings	***
Production curtailments	***
Expansions	***
Expansions	***
Other	***

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

Operations on truck and bus tires

Table VII-4 presents data on Thai producers’ installed capacity, practical overall capacity, and practical truck and bus tires capacity and production on the same equipment. By all measures, dedicated and shared truck and bus tire capacity in Thailand remained stable from 2021 to 2023 and were higher (by varying degrees) in January-June 2024 relative to January-June 2023. While broader measures of production and capacity utilization decreased from 2021 to 2023, truck and bus tire production and capacity utilization in Thailand increased. By all measures, however, production and capacity utilization in Thailand were higher in January-June 2024 than in January-June 2023.

Table VII-4**Truck and bus tires: Thai producers' installed and practical capacity and production on the same equipment as subject production, by period**

Capacity and production in 1,000 units; capacity utilization in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	***	***	86,114	***	43,228
Installed overall	Production	***	***	43,689	***	24,624
Installed overall	Utilization	***	***	50.7	***	57.0
Practical overall	Capacity	***	***	74,005	***	37,123
Practical overall	Production	***	***	43,689	***	24,624
Practical overall	Utilization	***	***	59.0	***	66.3
Practical truck and bus tires	Capacity	***	***	11,724	***	5,955
Practical truck and bus tires	Production	***	***	8,105	***	4,433
Practical truck and bus tires	Utilization	***	***	69.1	***	74.4

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

Table VII-5 presents Thai producers' reported capacity constraints since January 1, 2021.

Table VII-5**Truck and bus tires: Thai subject producers' reported capacity constraints since January 1, 2021**

Item	Firm name and accompanying narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Production bottlenecks	***
Other constraints	***
Other constraints	***

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

Table VII-6 presents information on the truck and bus tire operations of the responding producers and exporters in Thailand.

Table VII-6
Truck and bus tires: Data on producers in Thailand, by period

Quantity in 1,000 units

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
Capacity	***	***	11,724	***	5,955	12,156	12,291
Production	***	***	8,105	***	4,433	8,969	9,370
End-of-period inventories	***	***	603	***	988	642	599
Internal consumption	***	***	534	***	432	1,051	1,097
Commercial home market shipments	***	***	463	***	200	489	521
Home market shipments	***	***	997	***	632	1,540	1,618
Exports to the United States	***	***	3,622	***	1,773	3,785	3,897
Exports to all other markets	***	***	3,463	***	1,643	3,544	3,894
Export shipments	***	***	7,085	***	3,416	7,329	7,791
Total shipments	***	***	8,082	***	4,048	8,869	9,409

Table continued.

Table VII-6 Continued
Truck and bus tires: Data on producers in Thailand, by period

Ratio and share in percent

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
Capacity utilization ratio	***	***	69.1	***	74.4	73.8	76.2
Inventory ratio to production	***	***	7.4	***	11.1	7.2	6.4
Inventory ratio to total shipments	***	***	7.5	***	12.2	7.2	6.4
Internal consumption share	***	***	6.6	***	10.7	11.9	11.7
Commercial home market shipments share	***	***	5.7	***	4.9	5.5	5.5
Home market shipments share	***	***	12.3	***	15.6	17.4	17.2
Exports to the United States share	***	***	44.8	***	43.8	42.7	41.4
Exports to all other markets share	***	***	42.8	***	40.6	40.0	41.4
Export shipments share	***	***	87.7	***	84.4	82.6	82.8
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Producers in Thailand reported capacity and production increases of *** and *** percent, respectively, from 2021 to 2022, with lower levels in 2023, resulting in an irregular increase of *** percent in capacity and *** percent in production. While capacity was modestly higher in January-June 2024 relative to January-June 2023, production was *** percent higher in the January-June 2024 interim period. Both capacity and production are projected to increase from 2024 to 2025, by 1.1 and 4.5 percent, respectively.

Capacity utilization for Thai producers peaked in 2022 and increased irregularly by *** percentage points from 2021 to 2023. In January-June 2024, however, capacity utilization was *** percentage points higher than in January-June 2023, and is projected to be 2.5 percentage points higher in 2025 relative to 2024.

Producers in Thailand reported an initial increase of *** percent in total shipments of truck and bus tires from 2021 to 2022, followed by a decrease from 2022 to 2023, resulting in a net decline of *** percent in total shipments during 2021-23. Total shipments were *** percent higher in January-June 2024 relative to January-June 2023, and are projected to be 6.1 percent higher in 2025 compared to 2024. The trends in total shipments reflect those of export shipments, the largest component of truck and bus tire shipments by the Thai industry. Similarly, exports to the United States were low in 2023, after peaking in 2022. However,

exports of truck and bus tires to the United States were higher in January-June 2024 than in January-June 2023, and year-over-year growth is projected for full year 2024 and for 2025.

Home market shipments accounted for a small but growing share of total truck and bus tire shipments by the Thai industry. Such shipments were higher in each consecutive period, whether annual or partial, and by 2024-25 are projected to more than double their share of total shipments relative to 2021.

Alternative products

As shown in table VII-7, responding firms in Thailand produced other products on the same equipment and machinery used to produce truck and bus tires.

Table VII-7
Truck and bus tires: Thai producers' overall production on the same equipment as subject production, by product type and period

Quantity in 1,000 units; share in percent

Product type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Truck and bus tires	Quantity	***	***	8,105	***	4,433
PVLT tires	Quantity	***	***	***	***	***
OTR tires	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Out-of-scope products	Quantity	***	***	35,584	***	20,191
All products	Quantity	***	***	43,689	***	24,624
Truck and bus tires	Share	***	***	18.6	***	18.0
PVLT tires	Share	***	***	***	***	***
OTR tires	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Out-of-scope products	Share	***	***	81.4	***	82.0
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Tire types are passenger vehicle and light truck (PVLT) tires, off-the-road (OTR) tires, and other, which includes products that are produced using common machinery among truck and bus tires, but also require components and processes unique to those other products that are not used for production of truck and bus tires.

Total production of all products produced using shared equipment and machinery declined annually during 2021-23, for a two-year decrease of *** percent from 2021 to 2023, reflected in a steadily decline of *** percent in the production of out-of-scope products, offsetting an *** percent irregular increase in production of truck and bus tires over the same period. The 2021-23 decline in out-of-scope production reflected the steady decline of *** percent in the production of 'other products' over the same period, as production of PVLT tires and OTR tires each increased slightly by *** percent and *** percent from 2021 to 2023.

Out-of-scope production never accounted for less than *** percent of total production on shared equipment and machinery, and reached its peak in 2021, at *** percent of total production.⁵ ‘Other products’ constituted *** of total production in every period reported, but steadily declined during 2021-23 as a ratio to total production, a two-year decline of *** percentage points. At the same time, production of PVLT tires as a ratio to total production grew by *** percentage points, and OTR tires remained flat. These trends continued into 2024, with production of truck and bus tires *** percentage points higher in January-June 2024, as a ratio to total production, relative to January-June 2023. In out-of-scope products, production of ‘other products’ was *** percentage points lower in the second interim period, while production of PVLT tires was *** percent higher. *** reported the ability to switch production between products on shared equipment and machinery.⁶

Exports

According to GTA, the leading export markets for truck and bus tires from Thailand are the United States, Australia, and Egypt (table VII-8). During 2023, the United States was the largest export market for truck and bus tires from Thailand, accounting for 54.1 percent, followed by Australia (4.1 percent), and Egypt (2.6 percent).

⁵ ‘Other products’ accounted for a majority of out-of-scope production, and *** accounted for nearly all production of ‘other products’. *** reported that its ‘other products’ includes *** *** also accounted for the vast majority of PVLT tires production. *** foreign producer questionnaire, section II-3a.

⁶ ***. *** foreign producer questionnaires, section II-4a.

Table VII-8**New pneumatic tires, of rubber, of a kind used on buses or trucks: Exports from Thailand, by destination market and period**

Quantity in 1,000 units; value in 1,000 dollars

Destination market	Measure	2021	2022	2023
United States	Quantity	13,276	14,710	15,895
Australia	Quantity	1,208	1,195	1,193
Egypt	Quantity	933	485	751
Vietnam	Quantity	863	968	651
United Kingdom	Quantity	406	525	625
Germany	Quantity	703	906	600
Malaysia	Quantity	590	628	554
Russia	Quantity	333	258	502
United Arab Emirates	Quantity	653	525	491
All other destination markets	Quantity	7,868	8,127	8,116
All destination markets	Quantity	26,832	28,326	29,378
United States	Value	1,320,496	1,636,903	1,476,758
Australia	Value	119,045	127,795	138,196
Egypt	Value	47,773	27,114	40,179
Vietnam	Value	100,067	108,603	77,594
United Kingdom	Value	31,399	40,563	49,930
Germany	Value	56,645	80,958	64,806
Malaysia	Value	55,365	57,850	55,833
Russia	Value	50,737	45,111	87,608
United Arab Emirates	Value	48,481	43,462	42,165
All other destination markets	Value	750,663	844,788	898,244
All destination markets	Value	2,580,670	3,013,148	2,931,314

Table continued.

Table VII-8 Continued**New pneumatic tires, of rubber, of a kind used on buses or trucks: Exports from Thailand, by destination market and period**

Unit value in dollars per unit; share in percent

Destination market	Measure	2021	2022	2023
United States	Unit value	99	111	93
Australia	Unit value	99	107	116
Vietnam	Unit value	51	56	53
Germany	Unit value	116	112	119
Malaysia	Unit value	77	77	80
South Korea	Unit value	81	89	108
Saudi Arabia	Unit value	94	92	101
Japan	Unit value	152	175	174
Indonesia	Unit value	74	83	86
All other destination markets	Unit value	95	104	111
All destination markets	Unit value	96	106	100
United States	Share of quantity	49.5	51.9	54.1
Australia	Share of quantity	4.5	4.2	4.1
Vietnam	Share of quantity	3.5	1.7	2.6
Germany	Share of quantity	3.2	3.4	2.2
Malaysia	Share of quantity	1.5	1.9	2.1
South Korea	Share of quantity	2.6	3.2	2.0
Saudi Arabia	Share of quantity	2.2	2.2	1.9
Japan	Share of quantity	1.2	0.9	1.7
Indonesia	Share of quantity	2.4	1.9	1.7
All other destination markets	Share of quantity	29.3	28.7	27.6
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4011.20 as reported by Thai Customs Department in the Global Trade Atlas Suite database, accessed August 20, 2024.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2023 data.

U.S. inventories of imported merchandise

Table VII-9 presents data on U.S. importers' reported inventories of truck and bus tires.

Table VII-9
Truck and bus tires: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 units; ratio in percent

Measure	Source	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Inventories quantity	Thailand	352	1,128	634	946	754
Ratio to imports	Thailand	5.7	13.5	13.2	19.7	15.1
Ratio to U.S. shipments of imports	Thailand	5.5	14.9	12.0	17.8	15.9
Ratio to total shipments of imports	Thailand	***	***	***	***	***
Inventories quantity	Canada	***	***	***	***	***
Ratio to imports	Canada	***	***	***	***	***
Ratio to U.S. shipments of imports	Canada	***	***	***	***	***
Ratio to total shipments of imports	Canada	***	***	***	***	***
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Japan	***	***	***	***	***
Ratio to imports	Japan	***	***	***	***	***
Ratio to U.S. shipments of imports	Japan	***	***	***	***	***
Ratio to total shipments of imports	Japan	***	***	***	***	***
Inventories quantity	South Korea	***	***	***	***	***
Ratio to imports	South Korea	***	***	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***	***	***
Inventories quantity	Vietnam	***	***	***	***	***
Ratio to imports	Vietnam	***	***	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***	***	***
Ratio to total shipments of imports	Vietnam	***	***	***	***	***

Table continued.

Table VII-9 Continued

Truck and bus tires: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 units; ratio in percent

Measure	Source	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Inventories quantity	All other sources	***	***	***	***	***
Ratio to imports	All other sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All other sources	***	***	***	***	***
Ratio to total shipments of imports	All other sources	***	***	***	***	***
Inventories quantity	Nonsubject	1,290	1,824	1,236	1,430	1,356
Ratio to imports	Nonsubject	17.8	19.2	17.7	19.4	18.8
Ratio to U.S. shipments of imports	Nonsubject	18.5	21.2	17.2	18.8	19.8
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	1,642	2,952	1,870	2,376	2,110
Ratio to imports	All	12.2	16.5	15.9	19.5	17.3
Ratio to U.S. shipments of imports	All	12.3	18.3	15.0	18.4	18.2
Ratio to total shipments of imports	All	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Inventories of truck and bus tires from Thailand nearly tripled from 2021 to 2022, before declining by 43.8 percent from 2022 to 2023, for 2021-23 net growth of 80.1 percent. U.S. importers' subject inventories were 20.3 percent lower in January-June 2024 compared to January-June 2023.⁷ As a ratio to subject imports and to U.S. shipments of subject imports, subject inventories fluctuated but more than doubled from 2021 to 2023. In January-June 2024, inventories as a ratio to imports and U.S. shipments of imports were 4.6 and 1.9 percentage points lower, respectively, compared to January-June 2023, reflected by the lower inventory levels reported in the second of the two interim periods.

Inventories of truck and bus tires from nonsubject sources increased by 41.4 percent from 2021 to 2022, prior to declining by 32.2 percent from 2022 to 2023, resulting in a 2023 nonsubject inventory level comparable to that of 2021. The 2021-22 increase in importers' inventories of truck and bus tires from nonsubject sources was reflected in increases in inventories from all nonsubject sources, with the exception of ***. Although between 11 and 12 firms reported inventories from nonsubject sources in any given period, the majority of

⁷ *** firms reported inventories from Thailand. *** reported the largest 2021-23 growth, with *** tires imported from Thailand in inventory in 2023.

inventories from nonsubject sources were accounted for by two firms in each period, with *** accounting for the majority of inventories from nonsubject sources in 2022, 2023, and in both interim periods.⁸ As with subject inventories, inventories from nonsubject sources were 5.2 percent lower in January-June 2024 compared to January-June 2023.⁹ As a ratio to nonsubject imports, U.S. shipments of imports and total imports, inventories from nonsubject sources peaked in 2022 but remained approximately even in 2023 compared to 2021, and remained essentially flat across January-June 2023 and January-June 2024.

Total inventories of truck and bus tires increased irregularly by 13.9 percent from 2021 to 2023, following an initial increase of 79.8 percent from 2021 to 2022. Total inventories of truck and bus tires were 11.2 percent lower in the January-June 2024 interim period. Total inventories of truck and bus tires as a ratio to imports, U.S. shipments, and total shipments of imports each increased irregularly by between *** and *** percentage points during 2021-23, and all three measures were higher in January-June 2023 than in any other period reported.

⁸ In 2021, *** reported the second-highest level of inventories from nonsubject sources. ***. Goodyear's preliminary phase importer questionnaire, section I-2a.

⁹ The lower levels of inventory from nonsubject sources in January-June 2024 reflected the lower inventory levels reported by ***.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of truck and bus tires after June 30, 2024. Their reported data is presented in table VII-10. Importers reported arranged imports from Thailand and from nonsubject sources in all periods requested, with the majority of arranged imports coming from nonsubject sources in all periods requested. Of the 24 firms which reported arranged imports from any source, *** reported the highest levels of arranged imports in all periods reported.

Table VII-10
Truck and bus tires: U.S. importers' arranged imports, by source and period

Quantity in 1,000 units

Source	Jul-Sep 2024	Oct-Dec 2024	Jan-Mar 2025	Apr-Jun 2025	Total
Thailand	***	***	***	***	***
Canada	***	***	***	***	***
China	***	***	***	***	***
India	***	***	***	***	***
Japan	***	***	***	***	***
South Korea	***	***	***	***	***
Vietnam	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	5,344	2,998	1,612	1,636	11,590

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

Third-country trade actions

In October 2019, Egypt initiated an antidumping investigation on imports of tires for buses and lorries from China, India, Indonesia, and Thailand.

On March 3, 2021, Egypt imposed a definitive duty on imports of tires for buses and lorries from China and Thailand. The rate of duty on imports from Thailand ranges from 7.5 percent to 31.2 percent depending on the company, while the rate of duty on imports from China ranges from 9.8 percent to 36.9 percent, depending on the company.¹⁰

¹⁰ Global Trade Alert, <https://www.globaltradealert.org/intervention/78518/anti-dumping/egypt-definitive-anti-dumping-duties-on-imports-of-tyres-for-buses-and-lorries-from-china-and-thailand-and-investigation-o>, retrieved November 14, 2023.

Information on nonsubject countries

The following three data tables detail global truck and bus tire export trade by country, and global export trade data specific to nonsubject China and Vietnam during the 2021-23 period. Table VII-11 details global exports of truck and bus tires by country.

Table VII-11
New pneumatic tires, of rubber, of a kind used on buses or trucks: Global exports, by reporting country and by period

Value in 1,000 dollars, shares in percent

Exporting country	Measure	2021	2022	2023
United States	Value	1,708,818	1,863,396	1,915,627
Thailand	Value	2,580,670	3,013,148	2,931,314
China	Value	8,011,968	9,191,215	10,088,067
Germany	Value	1,226,522	1,271,887	1,358,842
Slovakia	Value	1,011,870	1,023,352	1,184,129
Vietnam	Value	844,449	1,279,625	1,180,168
Japan	Value	1,059,084	1,254,770	1,134,295
Canada	Value	916,179	920,945	1,000,638
Spain	Value	822,489	862,299	987,157
Turkey	Value	726,860	817,888	785,508
South Korea	Value	815,802	926,615	778,569
Poland	Value	790,928	862,736	777,511
All other exporters	Value	6,077,807	5,942,766	5,744,653
All reporting exporters	Value	26,593,446	29,230,644	29,866,477
United States	Share	6.4	6.4	6.4
Thailand	Share	9.7	10.3	9.8
China	Share	30.1	31.4	33.8
Germany	Share	4.6	4.4	4.5
Slovakia	Share	3.8	3.5	4.0
Vietnam	Share	3.2	4.4	4.0
Japan	Share	4.0	4.3	3.8
Canada	Share	3.4	3.2	3.4
Spain	Share	3.1	2.9	3.3
Turkey	Share	2.7	2.8	2.6
South Korea	Share	3.1	3.2	2.6
Poland	Share	3.0	3.0	2.6
All other exporters	Share	22.9	20.3	19.2
All reporting exporters	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 4011.20, as reported by various reporting agencies in the Global Trade Atlas Suite database, accessed August 27, 2024. Vietnam 2023 trade data were derived (mirrored) from official partner country import statistics under HS subheading 4011.20 as reported in the Global Trade Atlas Suite because export data were not available.

Note: United States is shown at the top, followed by Thailand, the country under investigation; all remaining top exporting countries in descending order of 2023 data. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed as shown as "---".

Global exports of \$26.6 billion in 2021 increased by 9.9 percent to \$29.2 billion in 2022, moderating thereafter by 2.2 percent growth to \$29.9 billion in 2023. Nonsubject country China had the largest amount of global country exports, increasing from \$8.0 billion, or 30.1 percent of the total in 2021, to \$10.1 billion or 33.8 percent in 2023, an increase of approximately 26.0 percent over the 2021-23 period. Thailand was the second leading global export source, accounting for between 9.7 and 10.3 percent of the global total from 2021 to 2023. Several nonsubject countries were in the 2.6 to 4.5 percent export share range in 2023, including Germany, Slovakia, Vietnam, Japan, Canada, Spain, Turkey, South Korea and Poland in order of rank.

China's global export trade by country and value are shown in table VII-12. China is the world's largest global export source for truck and bus tires. Overall, exports from China increased by approximately \$8.1 billion, 25.9 percent, to \$10.1 billion during the 2021-23 period. Exports during the 2021-23 period increased for all reporting countries identified except for the United States and the Philippines which declined in 2023. During the period, Mexico, the United States, Russia, the United Arab Emirates and Saudi Arabia were the largest export destinations, accounting for approximately \$2.5 billion in aggregate, or 24.9 percent of the identified country total in 2023.

At the same time, China is subject to a number of third country trade actions in force on truck and bus tires, including Brazil, Colombia, Egypt, the Eurasian Economic Commission (EEC), Turkey, and the United States. Additionally, the European Commission (EC), United Kingdom (UK), and South Africa have also imposed third country actions.¹¹

¹¹ *Truck and Bus Tires from China, Investigations Nos. 701-TA-556 and 731-TA-1311 (Review)*, USITC Publication 5535, August 2024, pp. I-25-28.

Table VII-12**New pneumatic tires of rubber, of a kind used on buses or trucks: China exports, by reporting country and by period**

Value in 1,000 dollars, shares in percent

Exporting Country	Measure	2021	2022	2023
United States	Value	625,544	675,671	447,027
Mexico	Value	466,282	564,424	728,734
Russia	Value	231,264	429,466	461,284
United Arab Emirates	Value	323,588	353,837	438,526
Saudi Arabia	Value	292,744	378,989	438,250
Malaysia	Value	205,441	238,052	320,043
Iraq	Value	175,800	269,509	315,197
Australia	Value	301,779	316,762	303,176
Indonesia	Value	175,336	241,883	269,002
Nigeria	Value	229,244	211,027	259,707
Canada	Value	224,956	294,285	236,672
Philippines	Value	219,795	215,947	211,798
All other exporters	Value	4,540,195	5,001,364	5,658,651
All reporting exporters	Value	8,011,968	9,191,215	10,088,067
United States	Share	7.8	7.4	4.4
Mexico	Share	5.8	6.1	7.2
Russia	Share	2.9	4.7	4.6
United Arab Emirates	Share	4.0	3.8	4.3
Saudi Arabia	Share	3.7	4.1	4.3
Malaysia	Share	2.6	2.6	3.2
Iraq	Share	2.2	2.9	3.1
Australia	Share	3.8	3.4	3.0
Indonesia	Share	2.2	2.6	2.7
Nigeria	Share	2.9	2.3	2.6
Canada	Share	2.8	3.2	2.3
Philippines	Share	2.7	2.3	2.1
All other exporters	Share	56.7	54.4	56.1
All reporting exporters	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 4011.20, as reported by China customs in the Global Trade Atlas database, accessed August 27, 2024.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2023 data.

Table VII-13 details Vietnam's global exports of truck and bus tires by country. The U.S. share of Vietnam's total exports was 55.1 percent in 2021, 55.6 percent in 2022, and 44.2 percent in 2023. Exports to the United States increased by 55.7 percent between 2021-22, before decreasing by 27.9 percent, to a 44.2 percent share in 2023, a trend similar to total U.S. imports of truck and bus tires. Exports from Vietnam to all other identified countries, with the exception of Canada, trended upwards, with Brazil's share increasing from 6.7 percent in 2021, to 10.9 percent in 2022, and 17.6 percent in 2023, representing an increase of 266.8 percent over the period. Total exports from Vietnam increased by 39.8 percent during 2021-23. Vietnam has shipped truck and bus tires to the United States for several years and its volume has increased over time, with the latest new capacity expansions by Chinese affiliates Sailun-Cooper, now Sailun-Goodyear in 2020, and Jinyu Tire in 2021.¹²

¹² Rubber News, <https://www.rubbernews.com/tire/cooper-expects-iv-plant-vietnam-be-producing-truck-tires-early-2020>, November 2019. Tire Business, <https://www.tirebusiness.com/news/jinyu-tire-starts-truck-tire-production-vietnam-plant>, April 2021.

Table VII-13**New pneumatic tires of rubber, of a kind used on buses or trucks: Vietnam exports, by reporting country and by period**

Value in 1,000 dollars; shares in percent

Exporting country	Measure	2021	2022	2023
United States	Value	465,264	724,442	522,032
Brazil	Value	56,776	139,297	208,270
Canada	Value	76,619	62,894	62,489
Poland	Value	11,642	30,647	34,502
United Kingdom HMRC	Value	7,875	24,016	32,020
Germany	Value	22,485	38,044	31,864
Egypt	Value	16,922	16,808	27,303
Spain	Value	19,048	28,997	27,289
Mexico	Value	17,277	10,416	19,624
Italy	Value	9,628	14,929	17,014
South Africa	Value	516	2,540	13,338
Kazakhstan	Value	3,533	6,201	12,196
All other exporters	Value	136,865	180,393	172,230
All reporting exporters	Value	844,449	1,279,625	1,180,168
United States	Share	55.1	56.6	44.2
Brazil	Share	6.7	10.9	17.6
Canada	Share	9.1	4.9	5.3
Poland	Share	1.4	2.4	2.9
United Kingdom HMRC	Share	0.9	1.9	2.7
Germany	Share	2.7	3.0	2.7
Egypt	Share	2.0	1.3	2.3
Spain	Share	2.3	2.3	2.3
Mexico	Share	2.0	0.8	1.7
Italy	Share	1.1	1.2	1.4
South Africa	Share	0.1	0.2	1.1
Kazakhstan	Share	0.4	0.5	1.0
All other exporters	Share	16.2	14.1	14.6
All reporting exporters	Share	100.0	100.0	100.0

Source: Official export statistics under HS subheading 4011.20 as reported by China Customs in the Global Trade Atlas Suite database, accessed August 27, 2024.

Note: United States is shown at the top, all remaining top export destinations shown in descending order of 2023 data. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Vietnam trade data is derived from official import statistics under HS subheading 4011.20 as reported by UN Comtrade in the Global Trade Atlas Suite database, accessed August 27, 2024, because export data was not available.

APPENDIX A
FEDERAL REGISTER NOTICES

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

Citation	Title	Link
88 FR 74208, October 30, 2023	<i>Truck and Bus Tires From Thailand; Institution of Antidumping Duty Investigation and Scheduling of Preliminary Phase Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2023-10-30/pdf/2023-23800.pdf
88 FR 77960, November 14, 2023	<i>Truck and Bus Tires From Thailand: Initiation of Less-Than-Fair-Value Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2023-11-14/pdf/2023-24994.pdf
88 FR 84831, December 6, 2023	<i>Truck and Bus Tires From Thailand</i>	https://www.govinfo.gov/content/pkg/FR-2023-12-06/pdf/2023-26786.pdf
89 FR 8649, February 2, 2024	<i>Truck and Bus Tires From Thailand: Postponement of Preliminary Determination in the Less-Than-Fair-Value Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2024-02-08/pdf/2024-02601.pdf
89 FR 43806, May 20, 2024	<i>Truck and Bus Tires From Thailand: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, and Postponement of Final Determination</i>	https://www.govinfo.gov/content/pkg/FR-2024-05-20/pdf/2024-11026.pdf
89 FR 49903, June 12, 2024	<i>Truck and Bus Tires From Thailand; Scheduling of the Final Phase of an Antidumping Duty Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2024-06-12/pdf/2024-12776.pdf
89 FR 53119, June 25, 2024	<i>Truck and Bus Tires From Thailand; Revised Schedule for the Subject Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2024-06-25/pdf/2024-13851.pdf
89 FR 65396, August 9, 2024	<i>Truck and Bus Tires From Thailand; Revised Schedule for the Subject Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2024-08-09/pdf/2024-17784.pdf
89 FR 83636 October 17, 2024	<i>Truck and Bus Tires From Thailand: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.govinfo.gov/content/pkg/FR-2024-10-17/pdf/2024-23917.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared as witnesses in the United States International Trade Commission's hearing:

Subject: Truck and Bus Tires from Thailand
Inv. No.: 731-TA-1658 (Final)
Date and Time: October 15, 2024 9:30 a.m.

Sessions were held in connection with this investigation in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Imposition (**Elizabeth J. Drake**, Schagrin Associates)

In Support of the Imposition of the Antidumping Duty Order:

Schagrin Associates
Washington, DC
on behalf of

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy,
Allied Industrial and Service Workers International Union, AFL-CIO, CLC ("USW")

Kevin Johnsen, Chair, USW Rubber and Plastics Industry Conference

Jon Wright, Maintenance Unit President, USW Local 1055L

Jody Juarez, President, USW Local 307L

Jerron L. ("Pete") Morton, President, USW Local 831L

Tom O'Shei, Former President, USW Local 135L

Elizabeth J. Drake)
Justin M. Neuman) – OF COUNSEL
Alessandra A. Palazzolo)

CLOSING REMARKS:

In Support of Imposition (**Elizabeth J. Drake**, Schagrin Associates)

APPENDIX C
SUMMARY DATA

Table C-1

Truck and bus tires: Summary data concerning the U.S. market, by item and period

Quantity=1,000 units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent—exceptions noted

Item	Reported data					Period changes				
	Calendar year			Jan-Jun		Comparison years			Jan-Jun	
	2021	2022	2023	2023	2024	2021-23	2021-22	2022-23	2023-24	
U.S. consumption quantity:										
Amount.....	29,901	36,164	28,274	13,825	15,536	▼(5.4)	▲20.9	▼(21.8)	▲12.4	
Producers' share (fn1).....	41.4	34.1	37.7	38.0	34.0	▼(3.7)	▼(7.3)	▲3.6	▼(4.0)	
Importers' share (fn1):										
Thailand.....	24.1	28.2	25.2	23.3	27.3	▲1.1	▲4.1	▼(3.0)	▲4.1	
Canada.....	5.2	4.1	5.1	5.1	5.1	▼(0.1)	▼(1.0)	▲1.0	▲0.0	
China.....	3.6	4.9	3.8	4.3	3.4	▲0.2	▲1.2	▼(1.0)	▼(1.0)	
India.....	2.0	2.1	1.7	1.6	2.3	▼(0.3)	▲0.1	▼(0.4)	▲0.7	
Japan.....	6.1	6.9	7.5	8.5	6.0	▲1.4	▲0.8	▲0.6	▼(2.5)	
South Korea.....	3.2	3.2	2.5	3.1	2.0	▼(0.6)	▲0.0	▼(0.7)	▼(1.1)	
Vietnam.....	6.4	8.4	8.2	7.0	9.6	▲1.8	▲1.9	▼(0.1)	▲2.6	
All other sources.....	8.0	8.2	8.3	9.1	10.3	▲0.2	▲0.2	▲0.1	▲1.2	
Nonsubject sources.....	34.5	37.8	37.1	38.8	38.7	▲2.6	▲3.2	▼(0.7)	▼(0.1)	
All import sources.....	58.6	65.9	62.3	62.0	66.0	▲3.7	▲7.3	▼(3.6)	▲4.0	
U.S. consumption value:										
Amount.....	6,843,793	9,018,805	7,430,668	3,739,815	3,802,717	▲8.6	▲31.8	▼(17.6)	▲1.7	
Producers' share (fn1).....	52.8	46.6	50.6	49.3	48.9	▼(2.2)	▼(6.2)	▲4.0	▼(0.4)	
Importers' share (fn1):										
Thailand.....	16.5	19.7	15.7	15.6	16.0	▼(0.8)	▲3.2	▼(4.0)	▲0.4	
Canada.....	6.7	5.0	6.7	5.8	8.1	▲0.0	▼(1.7)	▲1.7	▲2.3	
China.....	2.4	3.3	2.7	3.1	2.3	▲0.3	▲0.8	▼(0.5)	▼(0.8)	
India.....	1.5	1.6	1.2	1.1	1.7	▼(0.3)	▲0.1	▼(0.4)	▲0.6	
Japan.....	5.2	6.9	7.5	8.4	5.9	▲2.3	▲1.7	▲0.6	▼(2.5)	
South Korea.....	3.0	3.4	2.4	2.9	1.9	▼(0.6)	▲0.5	▼(1.0)	▼(1.0)	
Vietnam.....	4.0	5.2	4.5	3.9	5.3	▲0.5	▲1.3	▼(0.7)	▲1.5	
All other sources.....	8.0	8.2	8.6	9.8	9.7	▲0.7	▲0.3	▲0.4	▼(0.1)	
Nonsubject sources.....	30.7	33.6	33.7	35.1	35.0	▲3.0	▲3.0	▲0.1	▼(0.0)	
All import sources.....	47.2	53.4	49.4	50.7	51.1	▲2.2	▲6.2	▼(4.0)	▲0.4	
U.S. imports from:										
Thailand:										
Quantity.....	7,211	10,189	7,126	3,215	4,242	▼(1.2)	▲41.3	▼(30.1)	▲32.0	
Value.....	1,131,062	1,779,568	1,166,441	584,895	609,957	▲3.1	▲57.3	▼(34.5)	▲4.3	
Unit value.....	\$157	\$175	\$164	\$182	\$144	▲4.4	▲11.4	▼(6.3)	▼(21.0)	
Ending inventory quantity.....	352	1,128	634	946	754	▲***	▲***	▼***	▼***	
Canada:										
Quantity.....	1,542	1,496	1,443	700	790	▼(6.5)	▼(3.0)	▼(3.6)	▲12.9	
Value.....	458,835	450,994	499,495	217,451	309,044	▲8.9	▼(1.7)	▲10.8	▲42.1	
Unit value.....	\$298	\$302	\$346	\$311	\$391	▲16.4	▲1.3	▲14.8	▲25.9	
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***	
China:										
Quantity.....	1,090	1,765	1,086	599	525	▼(0.4)	▲61.9	▼(38.5)	▼(12.4)	
Value.....	164,954	293,665	203,284	115,889	86,701	▲23.2	▲78.0	▼(30.8)	▼(25.2)	
Unit value.....	\$151	\$166	\$187	\$194	\$165	▲23.7	▲10.0	▲12.5	▼(14.6)	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***	
India:										
Quantity.....	602	769	475	218	358	▼(21.1)	▲27.8	▼(38.2)	▲64.3	
Value.....	101,051	145,876	90,601	42,886	65,083	▼(10.3)	▲44.4	▼(37.9)	▲51.8	
Unit value.....	\$168	\$190	\$191	\$197	\$182	▲13.6	▲13.0	▲0.6	▼(7.6)	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Japan:										
Quantity.....	1,818	2,490	2,111	1,180	935	▲16.1	▲36.9	▼(15.2)	▼(20.7)	
Value.....	353,990	619,989	557,011	315,857	225,887	▲57.4	▲75.1	▼(10.2)	▼(28.5)	
Unit value.....	\$195	\$249	\$264	\$268	\$242	▲35.6	▲27.9	▲6.0	▼(9.8)	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***	

Table continued.

Table C-1 Continued

Truck and bus tires: Summary data concerning the U.S. market, by item and period

Quantity=1,000 units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year		Jan-Jun			Comparison years			Jan-Jun
	2021	2022	2023	2023	2024	2021-23	2021-22	2022-23	2023-24
South Korea:									
Quantity.....	952	1,157	717	435	311	▼(24.7)	▲21.5	▼(38.0)	▼(28.4)
Value.....	202,165	307,703	177,787	108,603	73,719	▼(12.1)	▲52.2	▼(42.2)	▼(32.1)
Unit value.....	\$212	\$266	\$248	\$250	\$237	▲16.7	▲25.2	▼(6.8)	▼(5.2)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Vietnam:									
Quantity.....	1,921	3,020	2,324	969	1,499	▲21.0	▲57.2	▼(23.1)	▲54.6
Value.....	271,953	472,359	334,212	144,617	203,161	▲22.9	▲73.7	▼(29.2)	▲40.5
Unit value.....	\$142	\$156	\$144	\$149	\$136	▲1.6	▲10.5	▼(8.0)	▼(9.2)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources:									
Quantity.....	2,399	2,961	2,334	1,261	1,596	▼(2.7)	▲23.5	▼(21.2)	▲26.6
Value.....	546,417	742,914	642,462	366,230	368,202	▲17.6	▲36.0	▼(13.5)	▲0.5
Unit value.....	\$228	\$251	\$275	\$290	\$231	▲20.8	▲10.1	▲9.7	▼(20.6)
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Nonsubject sources:									
Quantity.....	10,325	13,659	10,489	5,361	6,014	▲1.6	▲32.3	▼(23.2)	▲12.2
Value.....	2,099,365	3,033,501	2,504,853	1,311,533	1,331,797	▲19.3	▲44.5	▼(17.4)	▲1.5
Unit value.....	\$203	\$222	\$239	\$245	\$221	▲17.4	▲9.2	▲7.5	▼(9.5)
Ending inventory quantity.....	1,290	1,824	1,236	1,430	1,356	▼(4.2)	▲41.4	▼(32.2)	▼(5.2)
All import sources:									
Quantity.....	17,536	23,847	17,616	8,576	10,257	▲0.5	▲36.0	▼(26.1)	▲19.6
Value.....	3,230,426	4,813,069	3,671,295	1,896,428	1,941,754	▲13.6	▲49.0	▼(23.7)	▲2.4
Unit value.....	\$184	\$202	\$208	\$221	\$189	▲13.1	▲9.6	▲3.3	▼(14.4)
Ending inventory quantity.....	1,642	2,952	1,870	2,376	2,110	▲13.9	▲79.8	▼(36.7)	▼(11.2)

Table continued.

Table C-1 Continued

Truck and bus tires: Summary data concerning the U.S. market, by item and period

Quantity=1,000 units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year		2023	Jan-Jun		Comparison years			Jan-Jun
	2021	2022		2023	2024	2021-23	2021-22	2022-23	2023-24
U.S. producers*:									
Practical capacity quantity.....	15,377	15,041	14,599	7,529	7,425	▼(5.1)	▼(2.2)	▼(2.9)	▼(1.4)
Production quantity.....	13,604	13,532	12,691	6,719	6,269	▼(6.7)	▼(0.5)	▼(6.2)	▼(6.7)
Capacity utilization (fn1).....	88.5	90.0	86.9	89.2	84.4	▼(1.5)	▲1.5	▼(3.0)	▼(4.8)
U.S. shipments:									
Quantity.....	12,365	12,317	10,658	5,249	5,279	▼(13.8)	▼(0.4)	▼(13.5)	▲0.6
Value.....	3,613,367	4,205,736	3,759,373	1,843,387	1,860,963	▲4.0	▲16.4	▼(10.6)	▲1.0
Unit value.....	\$292	\$341	\$353	\$351	\$353	▲20.7	▲16.8	▲3.3	▲0.4
Export shipments:									
Quantity.....	1,041	919	878	436	454	▼(15.7)	▼(11.7)	▼(4.5)	▲4.1
Value.....	276,515	287,681	271,434	133,976	141,218	▼(1.8)	▲4.0	▼(5.6)	▲5.4
Unit value.....	\$266	\$313	\$309	\$307	\$311	▲16.4	▲17.8	▼(1.2)	▲1.2
Ending inventory quantity.....	1,937	2,304	3,390	3,268	4,047	▲75.0	▲18.9	▲47.1	▲23.8
Inventories/total shipments (fn1).....	14.4	17.4	29.4	28.7	35.3	▲14.9	▲3.0	▲12.0	▲6.6
Production workers.....	8,207	8,771	9,047	8,945	8,870	▲10.2	▲6.9	▲3.1	▼(0.8)
Hours worked (1,000s).....	16,218	16,632	16,931	8,618	8,391	▲4.4	▲2.6	▲1.8	▼(2.6)
Wages paid (\$1,000).....	502,781	577,335	608,620	306,265	315,451	▲21.1	▲14.8	▲5.4	▲3.0
Hourly wages (dollars per hour).....	\$31.00	\$34.71	\$35.95	\$35.54	\$37.59	▲16.0	▲12.0	▲3.6	▲5.8
Productivity (units per 1,000 hours).....	839	814	750	780	747	▼(10.6)	▼(3.0)	▼(7.9)	▼(4.2)
Unit labor costs.....	\$36.96	\$42.66	\$47.96	\$45.58	\$50.32	▲29.8	▲15.4	▲12.4	▲10.4
Net sales:									
Quantity.....	13,406	13,236	11,536	5,685	5,733	▼(13.9)	▼(1.3)	▼(12.8)	▲0.8
Value.....	3,889,882	4,493,417	4,030,807	1,977,364	2,002,181	▲3.6	▲15.5	▼(10.3)	▲1.3
Unit value.....	\$290	\$339	\$349	\$348	\$349	▲20.4	▲17.0	▲2.9	▲0.4
Cost of goods sold (COGS).....	2,926,537	3,430,969	3,268,960	1,572,226	1,609,707	▲11.7	▲17.2	▼(4.7)	▲2.4
Gross profit or (loss) (fn2).....	963,345	1,062,448	761,847	405,138	392,474	▼(20.9)	▲10.3	▼(28.3)	▼(3.1)
SG&A expenses.....	417,147	454,170	459,463	222,086	258,523	▲10.1	▲8.9	▲1.2	▲16.4
Operating income or (loss) (fn2).....	546,198	608,278	302,384	183,052	133,951	▼(44.6)	▲11.4	▼(50.3)	▼(26.8)
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit COGS.....	\$218	\$259	\$283	\$277	\$281	▲29.8	▲18.7	▲9.3	▲1.5
Unit SG&A expenses.....	\$31	\$34	\$40	\$39	\$45	▲28.0	▲10.3	▲16.1	▲15.4
Unit operating income or (loss) (fn2).....	\$41	\$46	\$26	\$32	\$23	▼(35.7)	▲12.8	▼(43.0)	▼(27.4)
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼(47.9)	▲15.5	▼(54.9)	▼(25.5)
COGS/sales (fn1).....	75.2	76.4	81.1	79.5	80.4	▲5.9	▲1.1	▲4.7	▲0.9
Operating income or (loss)/sales (fn1).....	14.0	13.5	7.5	9.3	6.7	▼(6.5)	▼(0.5)	▼(6.0)	▼(2.6)
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures.....	103,752	177,136	330,019	112,793	137,518	▲218.1	▲70.7	▲86.3	▲21.9
Research and development expenses.....	83,313	85,854	98,386	44,171	58,260	▲18.1	▲3.0	▲14.6	▲31.9
Total assets.....	2,516,032	2,862,027	3,029,451	NA	NA	▲20.4	▲13.8	▲5.8	NA

Source: Compiled from data submitted in response to Commission questionnaires for U.S. producers and from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting numbers 4011.20.1015 and 4011.20.5020. Imports are based on the imports for consumption data series. Import value data reflect landed duty-paid values. 508-compliant tables for these data are contained in parts III, IV, VI, and VII of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

APPENDIX D

INDIVIDUAL FIRM RESPONSES ON TIERS

Table D-1

Truck and bus tires: U.S. producers' responses for producers and brands in tier 1

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued.

Table D-1 Continued
Truck and bus tires: Importers' responses for producers and brands in tier 1

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
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***	***	***
***	***	***
***	***	***

Table continued.

Table D-2

Truck and bus tires: U.S. producers' responses on the characteristics of tires in tier 1

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-2 Continued

Truck and bus tires: Purchasers' responses on the characteristics of tires in tier 1

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***
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***	***
***	***
***	***

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

Table D-3

Truck and bus tires: U.S. producers' responses for producers and brands in tier 2

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued.

Table D-3 Continued

Truck and bus tires: Importers' responses for producers and brands in tier 2

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
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***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued.

**Table D-3 Continued
Truck and bus tires: Purchasers’ responses for producers and brands in tier 2**

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
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***	***	***
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***	***	***
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***	***	***
***	***	***
***	***	***

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

Table D-4

Truck and bus tires: U.S. producers' responses on the characteristics of tires in tier 2

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-4 Continued

Truck and bus tires: Importers' responses on the characteristics of tires in tier 2

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-4 Continued

Truck and bus tires: Purchasers' responses on the characteristics of tires in tier 2

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

Table D-5

Truck and bus tires: U.S. producers' responses for producers and brands in tier 3

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued.

Note: ***

Table D-5 Continued

Truck and bus tires: Importers' responses for producers and brands in tier 3

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Table continued.

Table D-5 Continued

Truck and bus tires: Purchasers' responses for producers and brands in tier 3

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

Table D-6

Truck and bus tires: U.S. producers' responses on the characteristics of tires in tier 3

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Note: ***

Table D-6 Continued

Truck and bus tires: Importers' responses on the characteristics of tires in tier 3

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-7 Continued

Truck and bus tires: Purchasers' responses for producers and brands in tier 4

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

Table D-8

Truck and bus tires: U.S. producers' responses on the characteristics of tires in tier 4

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-8 Continued

Truck and bus tires: Importers' responses on the characteristics of tires in tier 4

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-8 Continued

Truck and bus tires: Purchasers' responses on the characteristics of tires in tier 4

Firm name	Characteristics of tier
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

Table D-9

Truck and bus tires: Importers' responses for producers and brands in tier 5

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***

Table continued.

Table D-9 Continued

Truck and bus tires: Purchasers' responses for producers and brands in tier 5

Firm name	Producers	Brands
***	***	***
***	***	***
***	***	***

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

Table D-10

Truck and bus tires: Importers' responses on the characteristics of tires in tier 5

Firm name	Characteristics of tier
***	***
***	***

Table continued.

Table D-10 Continued

Truck and bus tires: Purchasers' responses on the characteristics of tires in tier 5

Firm name	Characteristics of tier
***	***
***	***
***	***

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

Table D-11

Truck and bus tires: Producers' reported quality differences between tiers

Firm name	Differences in quality between tiers
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-11 Continued

Truck and bus tires: Importers' reported quality difference between tiers

Firm name	Differences in quality between tiers
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued

Table D-11 Continued

Truck and bus tires: Importers' reported quality difference between tiers

Firm name	Differences in quality between tiers
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-11 Continued

Truck and bus tires: Purchasers' reported quality difference between tiers

Firm name	Differences in quality between tiers
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

Table D-12

Truck and bus tires: Producers' reported differences other than quality between tiers

Firm name	Differences other than quality between tiers
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-12 Continued

Truck and bus tires: Importers' reported differences other than quality between tiers

Firm name	Differences in quality between tiers
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table D-12 Continued

Truck and bus tires: Purchasers' reported differences other than quality between tiers

Firm name	Differences in quality between tiers
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

Table D-13

Truck and bus tires: Purchasers' reason that they concentrate in certain tiers (Question III-31 c)

Firm name	Reasons for concentrating and tiers in which they concentrate
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

APPENDIX E

**U.S. SHIPMENTS OF TRUCK AND BUS TIRES
BY CHANNEL, BRANDING, SOURCE, AND PERIOD**

Table E-1
Truck and bus tires: U.S. producers' U.S. shipments, by channel, branding type, and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit

Channel and branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
All channels and branding	Quantity	12,365	12,317	10,658	5,249	5,279
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
All channels and branding	Value	3,572,867	4,161,736	3,708,573	1,819,287	1,833,196
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
All channels and branding	Unit value	289	338	348	347	347

Table continued.

Table E-1 Continued**Truck and bus tires: U.S. producers' U.S. shipments, by channel, branding type, and period**

Shares in percent

Channel and branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Table E-2**Truck and bus tires: U.S. importers' U.S. shipments from Thailand, by channel and period**

Quantity in 1,000 units, value in 1,000 dollars, unit value in dollars per unit

Channel and branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***

Table continued.

Table E-2 Continued**Truck and bus tires: U.S. importers' U.S. shipments from Thailand, by channel and period**

Shares in percent

Channel and branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Table E-3
Truck and bus tires: U.S. importers' U.S. shipments from Canada, by channel and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit, shares in percent

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-4
Truck and bus tires: U.S. importers' U.S. shipments from China, by channel and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit, shares in percent

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-5
Truck and bus tires: U.S. importers' U.S. shipments from India, by channel and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit, shares in percent

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-6
Truck and bus tires: U.S. importers' U.S. shipments from Japan, by channel and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit, shares in percent

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-7
Truck and bus tires: U.S. importers' U.S. shipments from Vietnam, by channel and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit, shares in percent

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-8
Truck and bus tires: U.S. importers' U.S. shipments from all other sources, by channel and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit, shares in percent

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-9
Truck and bus tires: U.S. importers' U.S. shipments from nonsubject sources, by channel and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***

Table continued.

Table E-9 Continued

Truck and bus tires: U.S. importers' U.S. shipments from nonsubject sources, by channel and period

Shares in percent

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-10
Truck and bus tires: U.S. importers' U.S. shipments from all sources, by channel and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per unit

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Quantity	***	***	***	***	***
OEM: Branded	Quantity	***	***	***	***	***
Aftermarket: Private label	Quantity	***	***	***	***	***
Aftermarket: Branded	Quantity	***	***	***	***	***
Combined: All channels and branding	Quantity	***	***	***	***	***
OEM: Private label	Value	***	***	***	***	***
OEM: Branded	Value	***	***	***	***	***
Aftermarket: Private label	Value	***	***	***	***	***
Aftermarket: Branded	Value	***	***	***	***	***
Combined: All channels and branding	Value	***	***	***	***	***
OEM: Private label	Unit value	***	***	***	***	***
OEM: Branded	Unit value	***	***	***	***	***
Aftermarket: Private label	Unit value	***	***	***	***	***
Aftermarket: Branded	Unit value	***	***	***	***	***
Combined: All channels and branding	Unit value	***	***	***	***	***

Table continued.

Table E-10 Continued

Truck and bus tires: U.S. importers' U.S. shipments from all sources, by channel and period

Shares in percent

Tire type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Private label	Share of quantity	***	***	***	***	***
OEM: Branded	Share of quantity	***	***	***	***	***
Aftermarket: Private label	Share of quantity	***	***	***	***	***
Aftermarket: Branded	Share of quantity	***	***	***	***	***
Combined: All channels and branding	Share of quantity	100.0	100.0	100.0	100.0	100.0
OEM: Private label	Share of value	***	***	***	***	***
OEM: Branded	Share of value	***	***	***	***	***
Aftermarket: Private label	Share of value	***	***	***	***	***
Aftermarket: Branded	Share of value	***	***	***	***	***
Combined: All channels and branding	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-11
Truck and bus tires: U.S. producers' and U.S. importers' average unit values of U.S. shipments, by channel and branding, source, and period

Unit value in dollars per unit

Channel and branding	Source	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
OEM: Branded	U.S. producers	***	***	***	***	***
OEM: Branded	Thailand	***	***	***	***	***
OEM: Branded	Canada	***	***	***	***	***
OEM: Branded	China	***	***	***	***	***
OEM: Branded	India	***	***	***	***	***
OEM: Branded	Japan	***	***	***	***	***
OEM: Branded	South Korea	***	***	***	***	***
OEM: Branded	Vietnam	***	***	***	***	***
OEM: Branded	All other sources	***	***	***	***	***
OEM: Branded	Nonsubject sources	***	***	***	***	***
OEM: Branded	All import sources	***	***	***	***	***
Aftermarket: Private label	U.S. producers	***	***	***	***	***
Aftermarket: Private label	Thailand	***	***	***	***	***
Aftermarket: Private label	Canada	***	***	***	***	***
Aftermarket: Private label	China	***	***	***	***	***
Aftermarket: Private label	India	***	***	***	***	***
Aftermarket: Private label	Japan	***	***	***	***	***
Aftermarket: Private label	South Korea	***	***	***	***	***
Aftermarket: Private label	Vietnam	***	***	***	***	***
Aftermarket: Private label	All other sources	***	***	***	***	***
Aftermarket: Private label	Nonsubject sources	***	***	***	***	***
Aftermarket: Private label	All import sources	***	***	***	***	***

Table continued.

Table E-11
Truck and bus tires: U.S. producers' and U.S. importers' average unit values of U.S. shipments, by channel and branding, source, and period

Unit value in dollars per unit

Channel and branding	Source	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Aftermarket: Branded	U.S. producers	***	***	***	***	***
Aftermarket: Branded	Thailand	***	***	***	***	***
Aftermarket: Branded	Canada	***	***	***	***	***
Aftermarket: Branded	China	***	***	***	***	***
Aftermarket: Branded	India	***	***	***	***	***
Aftermarket: Branded	Japan	***	***	***	***	***
Aftermarket: Branded	South Korea	***	***	***	***	***
Aftermarket: Branded	Vietnam	***	***	***	***	***
Aftermarket: Branded	All other sources	***	***	***	***	***
Aftermarket: Branded	Nonsubject sources	***	***	***	***	***
Aftermarket: Branded	All import sources	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Note: ***. Email from ***, September 27, 2024. ***. Email from ***, September 27, 2024.

Figure E-1
Truck and bus tires: Average unit values of U.S. producers' and U.S. importers' U.S. OEM branded shipments, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires, as shown in table E-1.

Figure E-2

Truck and bus tires: Average unit values of U.S. producers' and U.S. importers' U.S. aftermarket private label shipments, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires, as shown in table E-1.

Figure E-3
Truck and bus tires: Average unit values of U.S. producers' and U.S. importers' U.S. aftermarket branded shipments, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires, as shown in table E-1.

APPENDIX F
NONSUBJECT COUNTRY PRICE DATA

Seven importers reported price data for China and Vietnam for products 1-4 sold to OEMs and to the aftermarket. Price data reported by these firms accounted for 18.3 percent of U.S. commercial shipments from China and 22.7 percent from Vietnam. These price items and accompanying data are comparable to those presented in tables V-5 to V-8. Price and quantity data for China and Vietnam are shown in tables F-1 to F-4 and in figures F-1 to F-8 (with domestic and Thailand sources).

In comparing China pricing data with U.S. producer pricing data, prices for product imported from China were lower than prices for U.S.-produced product in 48 instances and higher in 20 instances. In comparing China pricing data with Thailand pricing data, prices for product imported from China were lower than prices for product imported from Thailand in 5 instances and higher in 51 instances.

In comparing Vietnam pricing data with U.S. producer pricing data, prices for product imported from Vietnam were lower than prices for U.S.-produced product in 62 instances and higher in 4 instances. In comparing Vietnam pricing data with Thailand pricing data, prices for product imported from Vietnam were lower than prices for product imported from Thailand in 15 instances and higher in 41 instances. A summary of price differentials is presented in table F-5.

Table F-1

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 sales by source, type of purchaser, and quarter January 2021- June 2024

Price in dollars per unit, quantity in units.

Period	U.S. OEM price	U.S. OEM quantity	China OEM price	China OEM quantity	Vietnam OEM price	Vietnam OEM quantity
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***

Period	U.S. aftermarket price	U.S. aftermarket quantity	China aftermarket price	China aftermarket quantity	Vietnam aftermarket price	Vietnam aftermarket quantity
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***

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

Note: Product 1: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph).

Table F-2

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source, type of purchaser, and quarter January 2021- June 2024

Price in dollars per unit, quantity in units.

Period	U.S. OEM price	U.S. OEM quantity	China OEM price	China OEM quantity	Vietnam OEM price	Vietnam OEM quantity
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***

Period	U.S. aftermarket price	U.S. aftermarket quantity	China aftermarket price	China aftermarket quantity	Vietnam aftermarket price	Vietnam aftermarket quantity
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***

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

Note: Product 2: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph).

Table F-3

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 sales by source, type of purchaser, and quarter January 2021- June 2024

Price in dollars per unit, quantity in units.

Period	U.S. OEM price	U.S. OEM quantity	China OEM price	China OEM quantity	Vietnam OEM price	Vietnam OEM quantity
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***

Period	U.S. aftermarket price	U.S. aftermarket quantity	China aftermarket price	China aftermarket quantity	Vietnam aftermarket price	Vietnam aftermarket quantity
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***

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

Note: Product 3: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph).

Table F-4

Truck and bus tires: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 sales by source, type of purchaser, and quarter January 2021- June 2024

Price in dollars per unit, quantity in units.

Period	U.S. OEM price	U.S. OEM quantity	China OEM price	China OEM quantity	Vietnam OEM price	Vietnam OEM quantity
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***

Period	U.S. aftermarket price	U.S. aftermarket quantity	China aftermarket price	China aftermarket quantity	Vietnam aftermarket price	Vietnam aftermarket quantity
2021 Q1	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***

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

Note: Product 4: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

Figure F-1
Truck and bus tires: Weighted-average prices and quantities of domestic and imported product 1 to OEM by quarter

Price of product 1 OEM

* * * * *

Volume of product 1 OEM

* * * * *

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

Note: Product 1: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph).

Figure F-2
Truck and bus tires: Weighted-average prices and quantities of domestic and imported product 1 to aftermarket by quarter

Price of product 1 aftermarket

* * * * *

Volume of product 1 aftermarket

* * * * *

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

Note: Product 1: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R22.5, 16 ply rating, load range of H, speed rating L (75 mph).

Figure F-3
Truck and bus tires: Weighted-average prices and quantities of domestic and imported product 2 to OEM by quarter

Price of product 2 OEM

* * * * *

Volume of product 2 OEM

* * * * *

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

Note: Product 2: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph).

Figure F-4
Truck and bus tires: Weighted-average prices and quantities of domestic and imported product 2 to aftermarket by quarter

Price of product 2 aftermarket

* * * * *

Volume of product 2 aftermarket

* * * * *

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

Note: Product 2: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 11R24.5, 16 ply rating, load range of H, speed rating L (75 mph).

Figure F-5
Truck and bus tires: Weighted-average prices and quantities of domestic and imported product 3 to OEM by quarter

Price of product 3 OEM

* * * * *

Volume of product 3 OEM

* * * * *

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

Note: Product 3: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph).

Figure F-6
Truck and bus tires: Weighted-average prices and quantities of domestic and imported product 3 to aftermarket by quarter

Price of product 3 aftermarket

* * * * *

Volume of product 3 aftermarket

* * * * *

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

Note: Product 3: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 295/75R22.5, 14 ply rating, load range of G, speed rating L (75 mph).

Figure F-7
Truck and bus tires: Weighted-average prices and quantities of domestic and imported product 4 to OEM by quarter

Price of product 4 OEM						
*	*	*	*	*	*	*

Volume of product 4 OEM						
*	*	*	*	*	*	*

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

Note: Product 4: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

Figure F-8
Truck and bus tires: Weighted-average prices and quantities of domestic and imported product 4 to aftermarket by quarter

Price of product 4 aftermarket

* * * * *

Volume of product 4 aftermarket

* * * * *

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

Note: Product 4: Truck and bus tire, tires designated for drive application (excluding all-position/all-purpose tires), size 225/70R19.5, 14 ply rating, load range of G, speed rating L (75 mph).

Table F-5
Truck and bus tires: Summary of higher/(lower) unit values, by source, January 2021-June 2024

Comparison	Number of quarters lower	Quantity lower (units)	Number of quarters higher	Quantity higher (units)
China vs. United States	36	***	20	***
Vietnam vs. United States	55	***	1	***
China vs. Thailand	5	***	51	***
Vietnam vs. Thailand	15	***	41	***

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

