Overhead Door Counterbalance Torsion Springs from China and India

Investigation Nos. 701-TA-746-747 and 731-TA-1724-1725 (Preliminary)

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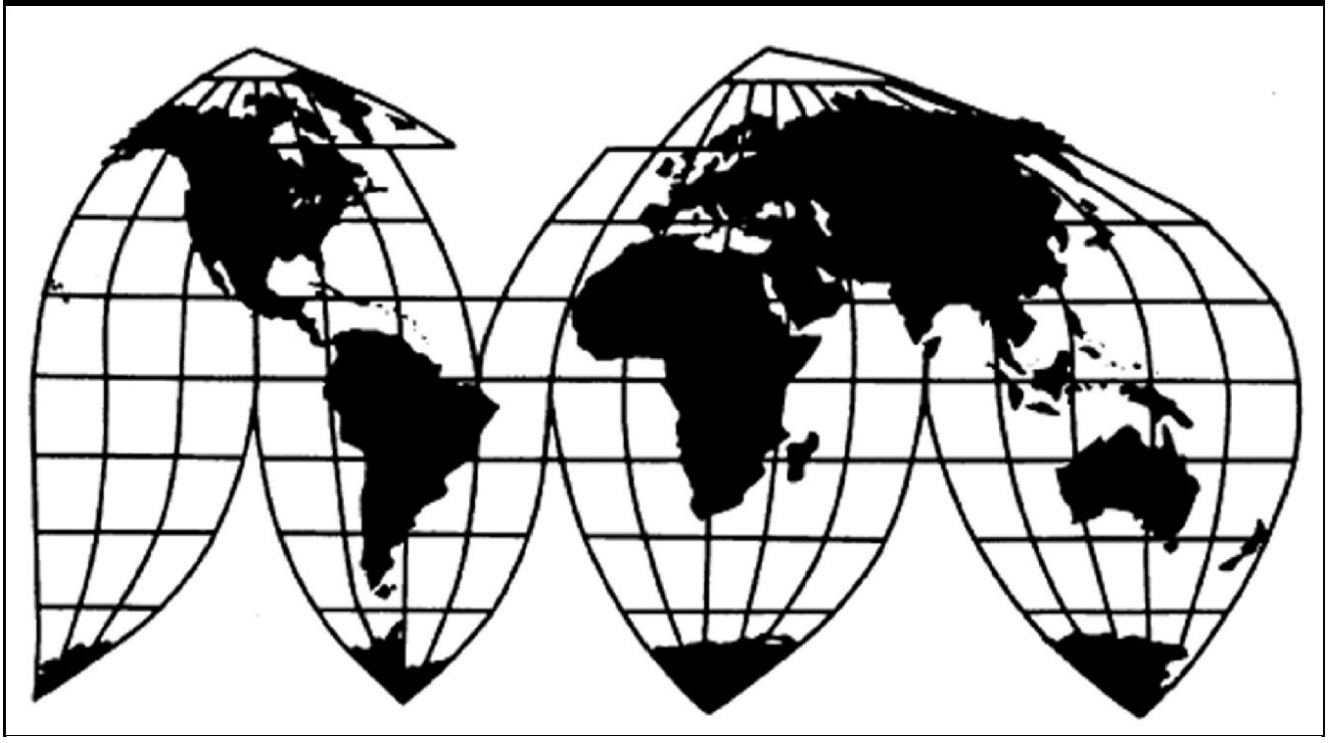
U.S. International Trade Commission



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U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-746-747 and 731-TA-1724-1725 (Preliminary)

Overhead Door Counterbalance Torsion Springs from China and India

DETERMINATIONS

On the basis of the record[1] developed in the subject investigations, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of overhead door counterbalance torsion springs from China and India, provided for in subheadings 7308.90.95, 7320.20.50, 8412.80.10, and 8412.90.90 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value ("LTFV") and to be subsidized by the governments of China and India.[2]

COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

Pursuant to section 207.18 of the Commission's rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in § 207.21 of the Commission's rules, upon notice from the U.S. Department of Commerce ("Commerce") of affirmative preliminary determinations in the investigations under §§ 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under §§ 705(a) or 735(a) of the Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Any other party may file an entry of appearance for the final phase of the investigations after publication of the final phase notice of scheduling. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigations. As provided in section 207.20 of the Commission's rules, the Director of the Office of Investigations will circulate draft questionnaires for the final phase

[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 92901 (November 25, 2024); 89 FR 92895 (November 25, 2024).

of the investigations to parties to the investigations, placing copies on the Commission's Electronic Document Information System (EDIS, https://edis.usitc.gov), for comment.

BACKGROUND

On October 29, 2024, IDC Group, Inc., Minneapolis, Minnesota, Iowa Spring Manufacturing, Inc., Adel, Iowa, and Service Spring Corp., Maumee, Ohio, filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of overhead door counterbalance torsion springs from China and India and LTFV imports of overhead door counterbalance torsion springs from China and India. Accordingly, effective October 29, 2024, the Commission instituted countervailing duty investigation Nos. 701-TA-746-747 and antidumping duty investigation Nos. 731-TA-1724-1725 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* of November 4, 2024 (89 FR 87598). The Commission conducted its conference on November 19, 2024. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of overhead door counterbalance torsion springs ("overhead door springs") from China and India that are allegedly sold in the United States at less than fair value and imports of the subject merchandise from China and India that are allegedly subsidized by the governments of China and India.

I. The Legal Standard for Preliminary Determinations

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

II. Background

The petitions in these investigations were filed on October 29, 2024, by IDC Group, Inc. ("IDC Spring"), Iowa Spring Manufacturing, Inc. ("Iowa Spring"), and Service Spring Corp. ("Service Spring") (collectively, "Petitioners"), domestic producers of overhead door springs.[3] Petitioners appeared at the staff conference accompanied by counsel and submitted a postconference brief.[4]

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[1] 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); *see also American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States, 2*0 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

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

[3] Petitions, EDIS Doc. 835843 (Oct. 29, 2024).

[4] Petitioners' Postconference Brief, EDIS Doc. 837909 (Nov. 22, 2024) ("Pet. Postconference Br.") at 1.

No respondent entity participated in the staff conference. Alcomex Beheer B.V., Alcomex Springs Pvt Ltd., and Alcomex Springs Inc. (collectively, "Alcomex"), a foreign producer and U.S. importer of overhead door springs from India, submitted a postconference brief.[5] Mfg. Direct USA, Inc. dba AlumaDoor ("AlumaDoor"), a U.S. importer and purchaser of overhead door springs, also submitted a postconference brief.[6]

U.S. industry data are based on the questionnaire responses of four domestic producers, accounting for a large majority of U.S. production of overhead door springs in 2023.[7] Overhead door springs are classified under HTS statistical reporting numbers 7320.20.5025, 7320.20.5045, and 7320.20.5060 which are basket categories that comprise in-scope overhead door springs as well as out of scope product. Questionnaire responses were received from 15 U.S. importers, accounting for 6.5 percent[8] of imports from China and *** percent of U.S. imports from India under HTS statistical reporting numbers 7320.20.5025, 7320.20.5045, and 7320.20.5060 in 2023.[9] Due to the very limited coverage in the questionnaire responses, it appears that information submitted as part of the petitions provides the most accurate estimate of total imports of overhead door springs from China on this preliminary record.[10] In contrast, because of the much higher coverage resulting from questionnaire responses, imports

[5] Alcomex Beheer B.V., Alcomex Springs Pvt Ltd., and Alcomex Springs Inc.'s Postconference Brief, EDIS Doc. 837928 (Nov. 22, 2024) ("Alcomex Postconference Br.") at 1.

[6] AlumaDoor's Postconference Brief, EDIS Doc. 837945 (Nov. 22, 2024) ("AlumaDoor Postconference Br.") at 1.

[7] Petitions at Table 1 (estimating that the three petitioners account for approximately *** percent of total U.S. production). Napoleon Spring, which also provided a U.S. producer questionnaire in addition to Petitioners, accounted for *** percent of responding U.S. producers' U.S. production in 2023. *See* Confidential Staff Report ("CR"), INV-WW-153, EDIS Doc. 838754 (Dec. 6, 2024) at Table III-1. Despite numerous inquiries from staff, Wayne Dalton Manufacturing. ("Wayne Dalton"), a U.S. producer of the domestic like product, did not submit a producer questionnaire response within the deadlines for questionnaire responses or postconference briefs. CR/PR at III-1 n.1. Overhead Door Corporation ("Overhead Door Corp."), Wayne Dalton's corporate parent, ultimately submitted a producer questionnaire response on behalf of Wayne Dalton on December 6, 2024, after all relevant deadlines and the same day as the issuance of the final version of the confidential staff report. Overhead Door Corp.'s U.S. producer questionnaire response, EDIS Doc. 838744 (Dec. 6, 2024). As a result, it was not possible to evaluate Wayne Dalton's production data, financial data, and narrative responses to questions and integrate them into the report.

[8] This figure is calculated using Petitioners' estimate of imports of overhead door springs from China contained in the petition. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third-party service provider. The staff report includes a detailed comparison of available import datasets for China in the preliminary phase of these investigations. *See* CR/PR at Tables D-1, D-2, and D-3.

[9] CR/PR at IV-1.

[10] CR/PR at IV-1.

from India are based on official Commerce statistics and data received in response to the Commission's questionnaires in this preliminary phase of the investigations.[11] The Commission received responses to its questionnaires from two foreign producers of subject merchandise. It received a response to its questionnaire from one producer/exporter in China, accounting for *** percent of production of subject merchandise from China in 2023.[12] The Commission also received a questionnaire response from one producer/exporter in India, accounting for approximately *** percent of production of subject merchandise from India in 2023.[13]

III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the "domestic like product" and the "industry."[14] 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."[15] 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."[16]

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.[17] 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

[11] CR/PR at I-4, IV-1, VII-3. As noted above, the relevant HTS statistical reporting numbers contain out-of-scope merchandise, and therefore, imports from India, which are based on official import statistics, may be overstated.

[12] CR/PR at VII-3. The one producer/exporter in China, accounts for *** percent of U.S. imports from China in 2023. *Id*.

[13] CR/PR at VII-3. The one producer/exporter in India, accounts for *** U.S. imports from India in 2023. *Id*.

[14] 19 U.S.C. § 1677(4)(A).

[15] 19 U.S.C. § 1677(4)(A).

[16] 19 U.S.C. § 1677(10).

[17] 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).

Commission's like product analysis."[18] The Commission then defines the domestic like product in light of the imported articles Commerce has identified.[19] 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.[20] No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.[21] The Commission looks for clear dividing lines among possible like products and disregards minor variations.[22] The Commission may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.[23]

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

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

[19] *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).

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

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

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

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

The merchandise covered by these investigations is helically-wound, overhead door counterbalance torsion steel springs (overhead door counterbalance torsion springs) and any cones, plugs or other similar fittings for mounting and creating torque in the spring (herein collectively referred to as cones) attached to or entered with and invoiced with the subject overhead door counterbalance torsion springs. Overhead door counterbalance torsion springs are helical steel springs with tightly wound coils that store and release mechanical energy by winding and unwinding along the spring's axis by an angle, using torque to create a lifting force in the counterbalance assembly typically used to raise and lower overhead doors, including garage doors, industrial rolling doors, warehouse doors, trailer doors, and other overhead doors, gates, grates, or similar devices. The merchandise covered by these investigations covers all overhead door counterbalance torsion springs with a coil inside diameter of 15.8 millimeters (mm) or more but not exceeding 304.8 mm (measured across the diameter from inner edge to inner edge); a wire diameter of 2.5 mm to 20.4 mm; a length of 127 mm or more; and regardless of the following characteristics:

- wire type (including, but not limited to, oil-tempered wire, hard-drawn wire, music wire, galvanized or other coated wire);
- wire cross-sectional shape (*e.g.,* round, square, or other shapes);
- coating (*e.g.,* uncoated, oil- or water-based coatings, lubricant coatings, zinc, aluminum, zinc-aluminum, paint or plastic coating, *etc.*);
- winding orientation (left-hand or right-hand wind direction);
- end type (including, but not limited to, looped, double looped, clipped, long length, mini warehouse, Barcol, Crawford, Kinnear, Wagner, rolling steel or barrel ends); and
- whether the overhead door counterbalance torsion springs are fitted with hardware, including but not limited to fasteners, clips, and cones (winding or stationary cones).

For purposes of the diameters referenced above, where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above.

The steel torsion springs included in the scope of these investigations are produced from steel in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less, by weight.

Subject merchandise includes cones attached to or entered with and invoiced with the subject overhead door counterbalance torsion springs. Such cones, which are typically cast aluminum, aluminum alloy or steel (but may be made from other materials) are made to mount the subject springs to the overhead door counterbalance system and create and maintain torque in the spring. Cones or other similar fittings that are not attached to the subject springs or are not entered with and invoiced with the subject springs are not included within the scope unless entered as parts of kits as described below.

Subject merchandise also includes all subject overhead door counterbalance torsion springs and cones or other similar fittings for mounting and tensioning the spring entered as a part of overhead door kits, overhead door mounting or assembly kits, or as a part of a spring-operated motor assembly or as a part of a spring winder assembly kit for torsion springs. When counterbalance torsion springs and cones or other similar fittings for attaching and tensioning the torsion spring are entered as a part of such kits, only the counterbalance spring and cones or other similar fittings in the kit are within scope.

Subject merchandise also includes overhead door counterbalance torsion springs that have been further processed in a third country, including but not limited to cutting to length, attachment of hardware, cones or end-fittings, inclusion in garage door kits or garage door mounting or assembly kits, or any other processing that would not remove the merchandise from the scope of these investigations if performed in the country of manufacture of the in-scope overhead door counterbalance torsion springs.

All products that meet the written physical description are within the scope of these investigations unless specifically excluded. The following products are specifically excluded from the scope of these investigations:

- leaf springs (slender arc-shaped length of spring steel of a rectangular cross-section);
- disc springs (conical springs consisting of a convex disc with the outer edge working against the center of the disc);
- extension springs (close-wound round helical wire springs that store and release energy by resisting the external pulling forces applied to the spring's ends in the direction of its length);
- compression springs (helical coiled springs with open wound active coils (such open winding is also known as pitch) that are designed to compress under load or force); and
- spiral springs (torsion springs wound as concentric spirals such as a clock spring or mainspring).

The products subject to these investigations are currently classified under Harmonized Tariff Schedule of the United States (HTSUS) subheadings 7320.20.5020, 7320.20.5045, and 7320.20.5060. They may also be classified under HTSUS subheading 8412.90.9085 if entered as parts of spring-operated motors. They may also be classified in HTSUS subheading 8412.80.1000 (spring operated motors) if entered as part of a spring counterweight assembly for an overhead door. They may also be classified in HTSUS subheading 7308.90.9590, a basket category that includes metal garage doors entered with mounting accessories or assemblies. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.[24]

Overhead door springs are components of door counterbalance mechanisms that apply opposing forces to open and close overhead or rolling doors and gates, including residential and commercial garage doors, industrial rolling doors, warehouse doors, truck and trailer doors,

[24] *Overhead Door Counterbalance Torsion Springs From the People's Republic of China and India: Initiation of Less-Than-Fair Value Investigations*, 89 Fed. Reg. 92895, 92901 (Nov. 25, 2024) ("*AD Initiation Notice*"); *Overhead Door Counterbalance Torsion Springs From the People's Republic of China and India: Initiation of Countervailing Duty Investigations*, 89 Fed. Reg. 92901, 92905-06 (Nov. 25, 2024) ("*CVD Initiation Notice*"). The scopes of the antidumping and countervailing duty investigations are identical.

storage doors, and retail security gates, among others.[25] The springs store and release mechanical energy, winding up when the door is lowered and unwinding as the door is raised, to apply torque as the lifting force to ease raising of the door.[26] Their torque is conveyed through the rotating torsion shaft and paired drums (reels) on each side to steel cables attached at the bottom of the door.[27]

The spring wire is commonly made of either tempered high-carbon steel oil-tempered wire (ASTM A229) or hard drawn wire (ASTM A227) of high tensile strength and moderate ductility necessary for durability and the ability to maintain metal memory.[28] However, springs can also be of stainless or other alloy steel grades if requested by customers.[29] Industry standards that guide domestic manufacturing of overhead door springs include these ASTM International specifications for the dimensions and physical properties for the spring wire, Spring Manufacturers Institute ("SMI") specifications for dimensional tolerances for the torsion spring wire, and Door and Access Systems Manufacturing Association ("DASMA") standards for residential garage door counterbalance systems.[30]

The cross-sectional shape of the spring wire is most commonly circular but also can be of other shapes. The subject springs are available shot peened, plated, or coated to improve resistance to fatigue, corrosion, and cracking; to enhance the spring's aesthetic appearance; or both.[31] Overhead door springs are designed to undergo 10,000 or more cycles of being torqued (twisted or wound) followed by the torque being released (untwisted or unwound)

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[25] CR/PR at I-12. Petitioners' customers for overhead door springs include original equipment manufacturers ("OEMs"), distributors, and garage-door dealers and installers. Conf. Tr. at 46 (Boldenow), 47 (McAlear), 47–48 (Bianco).

[26] CR/PR at I-12.

[27] CR/PR at I-12–I-13.

[28] CR/PR at I-8; Pet. Postconference Br. at. 4.

[29] CR/PR at I-8; Conf. Tr. at 16–17 (McAlear).

[30] CR/PR at I-8–I-9; Conf. Tr. at 68–69 Boldenow); Pet. Postconference Br., Exh. 14: DASMA Standard for Counterbalance Systems on Residential Sector Garage Doors; Exh. 15: Spring Manufacturing Institute Torsion Spring Standards; Exh. 16: ASTM Designation A229 Standard Specification; Exh. 17: ASTM Designation A227 Standard Specification.

[31] CR/PR at I-9. Shot peening hardens the surface of the spring by striking it with spherical shot (metallic, glass or ceramic particles) with sufficient force to impart plastic deformation of exposed surfaces, resulting in compression stress and forming layers of compression dimples. Plating materials include zinc, aluminum, or zinc-aluminum. Coating materials include oil- or water-based substances including paints or polymers applied by powder coating or electrophoretic paint coating ("e-coating). Coatings provide some corrosion protection but do not enhance either the mechanical performance or cycle life of the spring itself. Conf. Tr. at 18, 41–42 (McAlear).

over their seven-year service life without metal fatigue or breakage.[32] Shot peening can improve a spring's cycle life by 50 percent, from 10,000 cycles to 15,000 cycles.[33] The average residential overhead door spring weighs approximately 10 pounds and those for commercial applications can weigh 100 pounds or more.[34]

The ends of overhead door springs are fitted with mounting hardware (commonly referred to as "cones" but also as "plugs," "spring plugs," or "couplers")[35] that are usually of cast aluminum or aluminum alloys but also can be of steel or other metals.[36] Their shapes reflect the different mounting functions at the opposite ends of the spring.[37] The stationary cone secures one end of the spring with nuts and bolts to a mounting bracket affixed to the wall above the overhead door frame. On the other end, the winding cone secures the spring to the rotating torsion shaft. The exterior surface of the cone is tapered and threaded to be twisted into the inside of the spring.[38] Frictional contact with the spring coils retains the cones within the ends of the spring. Moreover, as the spring is wound, its diameter shrinks and grips tighter onto the cone, preventing it from sliding out.[39]

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[32] CR/PR at I-9; Pet. Postconference Br. at 5.

[33] CR/PR at I-9. Otherwise, another way to improve spring cycle life is to increase the wire size. Conf. Tr. at 87–88 (McAlear).

[34] CR/PR at I-9; Conf. Tr. at 55 (Walkup).

[35] CR/PR at I-10; Conf. Tr. at 17–18 (McAlear).

[36] CR/PR at I-10; Conf. Tr. at 18–19 (McAlear).

[37] CR/PR at I-10. Individual cones are available in a wide variety of shapes to fit the various end configurations of springs designed for the specific configuration of the door counterbalance system. *See also* Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, EDIS Doc. 836652 (Nov. 7, 2024) ("Pet. Response Suppl. Quest."), at 6-7.

[38] CR/PR at I-10.

[39] CR/PR at I-11; Conf. Tr. at 71 (Walkup). Both domestic and imported overhead door springs are shipped fitted with cones, although some are shipped without cones to customers that install the cones themselves. Overhead door springs ten feet or more in length (referred to as "snakes") are available without cones for customers, such as overhead door installers, that cut the spring to custom lengths. CR/PR at I-11; Conf. Tr. at 18–19 (McAlear). A witness estimated that between 90 and 95 percent or more of tension springs are shipped fitted with cones. Examples of customers that install the cones themselves include OEM manufacturers who purchase the springs in bulk and small firms that repair overhead garage door lifting systems using purchased stock-length springs. Conf. Tr. at 38 (McAlear), 38-39 (Bianco), 39 (McGrath). Petitioners seek to include the cones (or other mounting hardware) within the scope, as well as the subject springs, when they are either: 1) already attached to the spring at the time of entry or 2) entered or invoiced with the subject springs. Petitioners assert that exporters in China and India frequently invoice and enter longer springs, in uncut lengths of ten feet or more, together with the cones to assemble the intended number of cut-to-length springs. However, cones that are not entered or invoiced with the subject springs are not included within the scope of these investigations. Petitions at 9; Pet. Response Suppl. Quest. at 8-9.

For other than residential overhead garage doors (including overhead and roller doors for trucks and trailers, commercial and industrial facilities), there are various other end shapes of springs designed to fit into specially designed end fittings for various specific door counterbalance systems.[40]

Door counterbalance systems consist of either a single or multiple springs.[41] Residential single-wide overhead door counterbalance systems rely on one spring while double-wide door counterbalance systems require two springs.[42] Overhead door springs may also be nested inside of one another to provide greater force in certain overhead door counterbalance systems.[43]

A. Arguments of the Parties

Petitioners' Arguments: Petitioners argue that the Commission should define a single domestic like product, coextensive with the scope.[44] They contend that all overhead door springs have the same physical characteristics and end uses, share the same production processes and manufacturing facilities using the same employees, are sold through the same channels of distribution, and are perceived by producers and customers to be part of a continuum of products used in overhead door counterbalance assemblies.[45] Further, Petitioners argue overhead door springs are all priced within a reasonable range of one another based on the weight of the wire in the springs, any additional processing or coating requested by the customer, and whether cones are included in the sale.[46]

Respondents' Arguments: Respondents made no arguments concerning the domestic like product.[47]

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[40] CR/PR at I-12; Pet. Response Suppl. Quest. at 7-9.

[41] CR/PR at I-13.

[42] CR/PR at I-13.

[43] CR/PR at I-14. One or two springs are placed inside a spring to generate more torque to lift a heavier door or to where there is less "head" space above the door frame. Conf. Tr. at 50–51 (Bianco). Counsel to petitioners argues that nested springs are within the same domestic like product, being produced on the same equipment, by the same producers, and sold to the same types of customers for the same general purpose. *Id*. at 51 (Cannon).

[44] Pet. Postconference Br. at 4-9.

[45] Pet. Postconference Br. at 4-8.

[46] Pet. Postconference Br. at 8.

[47] *See* Alcomex's Postconference Br. at 1-3; *see also* AlumaDoor Postconference Br. at 1-4.

B. Analysis and Conclusion

Based on the record, and in the absence of any contrary argument, we define a single domestic like product consisting of overhead door springs, coextensive with the scope in these investigations.

Physical Characteristics and Uses. All overhead door springs share the same physical characteristics and uses.[48] They are all tightly and helically wound springs typically made from either high carbon steel oil-tempered wire (ASTM A229) or hard drawn wire (ASTM A227) with a high tensile strength and moderate ductility.[49] These characteristics are necessary for durability and the ability to maintain metal memory.[50] Overhead door springs must be able to be torqued (twisted) and then have the torque released (untwisted) many thousands of times over their life span without significant metal fatigue or breakage.[51] They are manufactured within the range of wire diameters, coil lengths, and coil inside diameters set forth in the scope in order to provide the necessary power in overhead door counterbalance systems.[52]

Manufacturing Facilities, Production Processes, and Employees. All overhead door springs are produced in the same domestic facilities, on the same equipment, and by the same employees.[53] There are no other springs produced on the same equipment or by the same employees at any of the petitioning companies.[54] Other types of springs are produced in different facilities and generally by different companies altogether.[55]

Channels of Distribution. All domestically produced overhead door springs are sold through the same channels of distribution, with approximately four-fifths shipped to end users such as garage door installers or truck trailer manufacturers, and the remainder to distributors.[56]

Interchangeability. Overhead door springs are manufactured in a range of coil diameters, wire diameters, spring lengths, and wire types, as well as end configurations or coatings, depending on the weight of the overhead door, the type of door (*e.g.*, residential garage doors, truck trailer doors, storage unit curtain doors, warehouse doors) and customer

[48] CR/PR at I-5 to I-9; Pet. Postconference Br. at 4.
[49] CR/PR at I-8; Pet. Postconference Br. at 4.
[50] CR/PR at I-8; Pet. Postconference Br. at 4.
[51] CR/PR at I-9; Pet. Postconference Br. at 4-5.
[52] CR/PR at I-6; Pet. Postconference Br. at 5.
[53] CR/PR at I-16; Pet. Postconference Br. at 8.
[54] CR/PR at I-16; Pet. Postconference Br. at 8.
[55] CR/PR at I-16; Pet. Postconference Br. at 8.
[56] CR/PR at II-2.

preference.[57] Different sizes and configurations of springs can sometimes be interchanged for the same use.[58]

Producer and Customer Perceptions. Producers and customers consider overhead door springs to be part of a continuum of products used in overhead counterbalance assemblies.[59] They do not consider other types of springs to be within the same continuum.[60] The websites of the petitioners and purchasers all list overhead door torsion springs separately from extension springs and other industrial springs.[61]

Price. Petitioners argue that overhead door springs are all priced within a reasonable range of one another based on the weight of the wire in the springs, any additional processing or coating requested by the customer, and whether cones are included in the sale.[62] Domestic producers' prices for the four pricing products fluctuated *** in the range of $*** per pound during the period of investigation ("POI").[63]

Conclusion. The evidence on the record indicates that the various types of domestically produced overhead door springs share the same physical characteristic and uses and are manufactured using the same facilities, equipment and employees. They are produced in a range of dimensions and performance characteristics without clear dividing lines, serve the same end uses, travel through the same channels of distribution, and are perceived as part of a continuum of products with the same end uses. Prices for various products are in the same range. Therefore, we define, for the purposes of the preliminary phase of these investigations, a single domestic like product consisting of overhead door springs, coextensive with the scope definition.

IV. Domestic Industry

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[64] In defining the domestic

[57] CR/PR at I-6; Pet. Postconference Br. at 7.

[58] Pet. Postconference Br. at 7; *see also* Conf. Tr. at 53-54 (Boldenow) (affirming that a range of different products that could be selected in the design state would accomplish the same ultimate end use).

[59] Pet. Postconference Br. at 8, Conf. Tr. at 20 (McAlear).

[60] Pet. Postconference Br. at 8.

[61] Pet. Postconference Br. at 8.

[62] Pet. Postconference Br. at 8.

[63] CR/PR at Tables V-4—V-7; Pet. Postconference Br. at 8.

[64] 19 U.S.C. § 1677(4)(A).

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.

A. Related Parties

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to Section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.[65] Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.[66] In these preliminary phase investigations, there is one U.S. producer (***) which may qualify as a related party.

B. Arguments of the Parties

Petitioners' Arguments: Petitioners did not address whether *** should be excluded from the domestic industry pursuant to the related parties provision.[67] [68]

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[65] *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).

[66] 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.

[67] *See* Pet. Postconference Br. at 9.

[68] Petitioners initially asserted that appropriate circumstances may exist to exclude Wayne Dalton from the domestic industry because that company imported subject merchandise during the period of investigations. Pet. Postconference Br. at 9 n.8. Petitioners did not make this argument in their postconference brief on the grounds that Wayne Dalton had not submitted a questionnaire response, and they accordingly lacked specific information on the volume or value of the company's (Continued…)

Respondent's Arguments: Respondents made no arguments as to whether appropriate circumstances exist to exclude any domestic producer pursuant to the related parties provision.[69]

C. Analysis and Conclusion

These investigations raise the issue of whether appropriate circumstances exist to exclude *** pursuant to the related parties provision.[70]

*** is subject to possible exclusion from the domestic industry under the related parties provision because it directly imported overhead door springs from ***.[71] The company accounted for *** percent of U.S. production, and *** the petition.[72] *** states that it imported subject merchandise only in 2022 and 2023 due to ***.[73] *** imports of subject merchandise accounted for *** and *** percent of its U.S. production in 2022 and 2023, respectively.[74] ***, indicate that *** principal interest appears to be domestic production. Further, the record does not indicate that *** imports benefited its domestic production operations such that its inclusion in the domestic industry would mask injury to the domestic industry. For these reasons, and in the absence of any argument to the contrary, we find that appropriate circumstances do not exist to exclude *** from the domestic industry for purposes of these preliminary phase investigations.

Accordingly, based on our definition of the domestic like product, we define the domestic industry to include all domestic producers of overhead door springs for purposes of these preliminary phase investigations.

(…Continued)
imports. *Id*. In light of the untimely submission of the producer questionnaire response for Wayne Dalton, the Commission was unable to evaluate whether the company qualifies as a related party or if appropriate circumstances exist to exclude it from the domestic industry in these preliminary phase investigations. In any event, this question is moot, as there was not time to include Wayne Dalton's data in the aggregate domestic industry data presented in the staff report.

[69] *See* Alcomex Postconference Br. at 1-9; AlumaDoor Postconference Br. at 1-5.

[70] *See* CR/PR at III-2 ("*** directly imports the subject merchandise as does *** . . . .").

[71] CR/PR at III-3.

[72] CR/PR at Table III-3.

[73] CR/PR at III-11; *see also id*. at Table III-11 (***).

[74] CR/PR at III-12, Table III-10; *see also id*. at III-14, Table III-11 (U.S. producers' reasons for importing).

V. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible.[75] During the 12-month period preceding the filing of the petitions (October 2023 through September 2024), imports of overhead door springs from China accounted for *** percent of total imports and imports of overhead door springs from India accounted for *** percent of total imports.[76] As subject imports are clearly above negligible levels, we recommend that the Commission find that imports of overhead door springs from China and India are not negligible.

VI. Cumulation

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

(1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;

(2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;

(3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and

[75] 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

[76] CR/PR at IV-6, Table IV-3.

(4) whether the subject imports are simultaneously present in the market.[77]

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.[78] Only a "reasonable overlap" of competition is required.[79]

A. Arguments of the Parties

Petitioners' Arguments: Petitioners argue that imports of overhead door springs from China and India should be cumulated for purposes of assessing material injury by reason of subject imports.[80] They assert there is a reasonable overlap in competition between and among subject imports from China and India and the domestic like product because imports from China and India are fungible with each other and domestically produced overhead door springs, they compete in the same geographic markets, they are sold in the same channels of distribution, and they are simultaneously present in the U.S. market.[81]

Respondents' Arguments: Respondents made no arguments concerning cumulation for purposes of the Commission's analysis of present material injury.[82]

B. Analysis and Conclusion

We consider subject imports from China and India on a cumulated basis as we find that the statutory criteria for cumulation are satisfied. As an initial matter, Petitioners filed the

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

[78] *See*, *e.g.*, *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

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

[80] Pet. Postconference Br. at 18-21.

[81] Pet. Postconference Br. at 18-21.

[82] *See* Alcomex Postconference Br. at 1; AlumaDoor Postconference Br. at 1-4.

antidumping and countervailing duty petitions with respect to both China and India on the same day, October 29, 2024.[83]

Fungibility. Regardless of source, overhead door springs imported into the United States are produced from steel and share common physical characteristics such as coil inside diameter and wire diameter.[84]

*** U.S. producers reported that U.S.-produced overhead door springs are "always" interchangeable with subject imports from both China and India.[85] Similarly, nearly all responding U.S. importers reported that the domestic like product is "always" or "frequently" interchangeable with subject imports.[86]

Petitioners maintain that both they and subject importers sell overhead door springs in an array of types, sizes, and coatings.[87] Petitioners assert that there is no type of overhead door spring imported that the domestic industry does not produce.[88]

Channels of Distribution. Subject imports from both subject countries and the domestic like product are sold through the same distribution channels.[89] Domestic producers and importers of subject overhead door springs from China and India all reported ***.[90] Many of the customers of overhead door springs, whether produced domestically or in the subject countries, are manufacturers of residential and commercial garage doors or other overhead

[83] None of the statutory exceptions to cumulation apply.

[84] CR/PR at I-8—I-11; Pet. Postconference Br. at 19.

[85] CR/PR at II-11 ("{A}ll producers and nearly all importers reported that domestically produced overhead door springs and overhead door springs imported from China and India are always or frequently interchangeable."), Table II-8; Pet. Postconference Br. at 19, *citing* U.S. Producers' Questionnaire Responses at IV-20.

[86] CR/PR at II-11, Table II-8 (With respect to the comparison of U.S.-produced springs to Chinese and Indian imports, three responding firms indicated they were "always" interchangeable, and one firm indicated they were "frequently" Interchangeable); Pet. Postconference Br. at 19, *citing* U.S. Importers Questionnaire Responses at III-21.

[87] Pet. Postconference Br. at 19-20, Exh. 4: Boldenow Decl., pg. 2, para. 7, Exh. 6: McAlear Decl., pg. 2, para. 7; Exh. 5: Bianco Decl., pg. 2, para. 8; *see also* CR/PR at I-8—I-13.

[88] Pet. Postconference Br. at 20. Alcomex asserts that some domestic producers cannot perform particular coating or finishing operations in house and, therefore, have difficulty providing those products in a timely manner. Alcomex Postconference Br. at 2.

[89] CR/PR at II-2 (U.S. producers and importers sold to both end users and distributors), Table II-1. In 2023, U.S. imports from China were sold to both distributors (*** percent) and end users (*** percent). In 2023, U.S. imports from India were sold to both distributors (*** percent) and end users (*** percent). *Id*. at Table II-1; *see also* Pet. Postconference Br. at 20.

[90] CR/PR at II-2, Table II-1; Pet. Postconference Br. at 20, *citing* U.S. Importers' Questionnaire Responses at II-5b, II-6b.

doors, distributors who sell the springs to those overhead door producers, or garage door installers.[91]

Geographic Overlap. U.S. producers reported selling overhead door springs to all regions of the contiguous United States, as well as to other U.S. markets, such as Alaska, Hawaii, Puerto Rico, and the U.S. Virgin Islands.[92] Importers reported selling overhead door springs from China to all regions except the Northeast, while importers reported selling overhead door springs from India to the Midwest, Southeast, and Central Southwest.[93]

Simultaneous Presence in Market. Domestically produced overhead door springs have been available in the U.S. market throughout the POI.[94] Subject imports from each of the subject sources were present in the U.S. market in 2022, 2023, and interim 2024.[95]

Conclusion. The record indicates that subject imports from China and India are fungible with the domestic like product and each other, in that they are made from the same raw materials, to the same specifications, and are characterized by producers and significant numbers of importers as "always" or "frequently" interchangeable. There was an overlap in channels of distribution, with domestic producers and importers of subject overhead door springs from each subject source reporting ***. The record further indicates that imports from China and India and the domestic like product were sold in overlapping geographic markets and that overhead door springs from all three sources were simultaneously present in the U.S. market throughout all or most of the POI. In light of these considerations, the Commission finds that there is a reasonable overlap of competition between the domestic like product and imports from China and India and between imports from China and India.

We therefore cumulate subject imports from China and India for our analysis of whether there is a reasonable indication of material injury by reason of subject imports.

[91] Pet. Postconference Br. at 20, Conf. Tr. at 46 (Boldenow), 47 (McAlear, Bianco).

[92] CR/PR at II-3, Table II-2; Pet. Postconference Br. at 20-21, Table 2, *citing* U.S. Producers' Questionnaire Responses at IV-10; Importers' Questionnaire Responses at III-11; *Id*. at Exh. 3.

[93] CR/PR at II-3, Table II-2.

[94] CR/PR at Tables V-4—V-7.

[95] CR/PR at Tables IV-2, Tables V-4—V-7, and Tables V-8—V-10. Imports of overhead door springs from China also were present in 2021, while imports of overhead door springs from India were not. *Id*.

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

A. Legal Standard

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.[96] 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.[97] The statute defines "material injury" as "harm which is not inconsequential, immaterial, or unimportant."[98] In assessing whether there is a reasonable indication that the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.[99] 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."[100]

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is "materially injured or threatened with material injury by reason of" unfairly traded imports,[101] 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.[102] In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the "by reason of" standard must ensure that subject imports are more than a minimal or

[96] 19 U.S.C. §§ 1671b(a), 1673b(a).

[97] 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).

[98] 19 U.S.C. § 1677(7)(A).

[99] 19 U.S.C. § 1677(7)(C)(iii).

[100] 19 U.S.C. § 1677(7)(C)(iii).

[101] 19 U.S.C. §§ 1671b(a), 1673b(a).

[102] *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).

tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.[103]

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.[104] In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.[105] Nor does

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[103] 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).

[104] 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.

[105] SAA at 851-52 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports."); *Taiwan Semiconductor Industry Ass'n,* 266 F.3d at 1345 ("{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports." (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int'l Trade 2002) ("{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury" or make "bright-line distinctions" between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that "{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e*., it is not an 'other causal factor,' then there is nothing to (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.[106] It is clear that the existence of injury caused by other factors does not compel a negative determination.[107]

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."[108] 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." [109] The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed "rigid adherence to a specific formula."[110]

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

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(…Continued)
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.").

[106] S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

[107] *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.").

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

[109] *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.

[110] *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.[111] Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.[112]

B. Conditions of Competition and the Business Cycle

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

1. Demand Conditions

Overhead door springs provide the lifting force for counterbalance lift systems in applications such as residential and commercial garage doors, industrial rolling doors, and truck and trailer doors, among others.[113] Three of four U.S. producers and nine of 12 importers indicated that the market was subject to business cycles.[114] Generally, the overhead door spring market follows new construction trends in both commercial and residential construction, as well as remodeling industry trends.[115] Seasonally adjusted U.S. housing starts fluctuated from January 2021 to October 2024, reaching a period high in April 2022 but declining thereafter.[116] Housing starts declined by approximately 19 percent between January 2021 and June 2024, with a further slight decline from June to October 2024.[117] Firms reported seasonal variations in demand, with most indicating that demand is higher in the second and third quarters of the year and lower in the first and fourth quarters.[118]

All responding U.S. producers reported that U.S. demand for overhead door springs has fluctuated downward since January 1, 2021.[119] Petitioners assert that supply constraints in 2021, along with the pandemic effects driving demand for home construction projects and a

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

[112] *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.").

[113] CR/PR at I-3.

[114] CR/PR at II-7.

[115] CR/PR at II-6-7 ("U.S. demand for overhead door springs depends on the demand for U.S.-produced downstream products."); *see also* Pet. Postconference Br. at 10.

[116] CR/PR at II-7, Figure II-1, Table II-6.

[117] CR/PR at II-7.

[118] CR/PR at II-7. Importer ***, reported that in a typical year, January-June is its peak season, and that demand slowly ramps down until December. *Id*.

[119] CR/PR at II-7, Table II-5.

certain amount of panic buying by purchasers in 2022, led to a spike in demand in 2022,[120] which "normalized" in 2023.[121] They state that demand began increasing again in interim 2024 (January-June), which they believe is likely to continue.[122] A majority of responding importers (eight of 11 firms) reported that U.S. demand increased (either steadily or fluctuated upward).[123]

Alcomex states that there was a "surge in demand" during the COVID-19 pandemic in 2021 and 2022 that increased prices "dramatically".[124] Alcomex claims it entered the U.S. market in 2022 in response to demand for overhead door springs.[125]

All responding U.S. producers and importers reported that there were no substitutes for overhead door springs.[126]

Apparent U.S. consumption of overhead door springs fluctuated over the POI.[127] It increased from *** pounds in 2021 to *** pounds in 2022, and declined to *** pounds in 2023, a level *** percent lower than in 2021.[128] Apparent U.S. consumption of overhead door springs was *** pounds in interim 2024, *** percent higher than the *** pounds in interim 2023.[129]

2. Supply Conditions

The domestic industry was the largest source of overhead door springs in the U.S. market throughout the POI.[130] [131] Its share of the U.S. market decreased *** percentage points

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[120] Pet. Postconference Br. at 10, Exh. 3.

[121] Pet. Postconference Br. at 10.

[122] Pet. Postconference Br. at 10, Exh. 1, response to question 5.

[123] CR/PR at II-7. Importer *** reported that demand went up during the COVID-19 pandemic as U.S. supply was limited, and demand has decreased somewhat since then. *Id.*

[124] Alcomex Postconference Br. at 4-5.

[125] Alcomex Postconference Br. at 2.

[126] CR/PR at II-9.

[127] CR/PR at Tables IV-9, C-1. Apparent U.S. consumption represents U.S. shipments rather than demand.

[128] CR/PR at Table C-1.

[129] CR/PR at IV-18, Tables IV-9, C-1.

[130] CR/PR at IV-18, Tables IV-9, C-1.

[131] Petitioners alleged that a large proportion of Wayne Dalton's output of overhead door springs is used in the production of completed garage doors by its corporate parent, Overhead Door Corp. Petition, Exh. GEN-2, Boldenow Decl., pg. 2, para. 8; Pet. Postconference Briefs, Exh. 1, Response to Questions at 7. If correct, this allegation suggests that the captive production provision of section 771(7)(C)(iv) of the Tariff Act of 1930 (19 U.S.C. § 1677(7)(C)(iv) may apply to Wayne Dalton. However, in light of the untimely submission of the Wayne Dalton producer questionnaire response, we were unable to evaluate Petitioners' allegation or the applicability of the captive production provision for (Continued…)

from 2021 to 2022 (from *** to *** percent of apparent U.S. consumption) and then increased by *** percentage points from 2022 to 2023 to *** percent.[132] The domestic industry lost *** percentage points of U.S. market share between 2021 and 2023. Its share was *** percentage points lower in interim 2024, at *** percent, than in interim 2023, at *** percent.[133] Over the full POI (from January 1, 2021 to June 30, 2024) the domestic industry's market share decreased by *** percentage points.[134]

The parties appear to be in agreement that domestic producers experienced supply constraints in 2021 and 2022, when supplies of wire (the primary raw material input for producing overhead door springs) were tight due to the pandemic.[135] Petitioners contend that these constraints ended in 2022, and that the domestic industry's reported practical capacity of more than *** pounds per year in 2023 is *** to supply *** of U.S. demand.[136] They assert further that domestic producers can supply every size and type of overhead door spring in the market, in addition to "any coating or finish a customer wants, including shot peening, powder coating and e-coating." [137] Those producers who lacked relevant capabilities in house asserted that they could obtain them through outsourcing.[138]

Cumulated subject imports were the second largest source of supply to the U.S. market throughout the POI, and they gained market share from the domestic producers over the POI.[139] Their share of the U.S. market increased overall by *** percentage points from 2021 to

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(…Continued)
purposes of these preliminary phase investigations. We intend to examine this issue in any final phase investigations.

[132] CR/PR at Table C-1.

[133] CR/PR at Table C-1.

[134] CR/PR at Table C-1.

[135] Pet. Postconference Br. at 11; Alcomex Postconference Br. at 4-5; AlumaDoor Postconference Br. at 4.

[136] Pet. Postconference Br. at 11., Exhs. 3, 7. Majorities of domestic producers and importers reported experiencing supply constraints in 2021 and 2022. In contrast, no domestic producers and only two of 11 importers reported experiencing supply constraints after 2022. CR/PR at II-5-II-6 and Table II-4.

[137] Pet. Postconference Br. at 12, Exh. 4 (Boldenow Decl., pg. 2, para. 7) ("Domestic producers can supply every size and type of Overhead Door Spring in the market, in addition to 'any coating or finish a customer wants, including shot peening, powder coating and e-coating"); Conf. Tr. at 42 (Bianco) ("All of us have the ability to shot peen a spring. All of us have the ability to powder coat, e-coat, or a 24 water-based coating like we see here."). *See also id.*, Exh. 5 (Bianco Decl., pg. 2, para. 5); Exh. 6 (McAlear Decl., pg. 2, para. 7).

[138] Conf. Tr. at 65 (Boldenow, McAlear and Bianco); *see also* Pet. Postconference Br., Exh. 4 (Boldenow Decl., pg. 2, para. 7).

[139] CR/PR at IV-18, Tables IV-9, C-1.

2023, first increasing by *** percentage points from 2021 to 2022, and then decreasing *** percentage points from 2022 to 2023. Their share was *** percentage points higher, at *** percent in interim 2024, than in interim 2023, at *** percent. Over the full POI (from January 1, 2021 to June 30, 2024) subject import market share increased by *** percentage points. As there were no nonsubject imports in the U.S. market during the POI,[140] all of the gain in market share by subject imports came at the direct expense of the domestic industry's market share.[141]

Alcomex argues that domestic producers lack in-house capacity to produce overhead door springs with certain technical specifications, particularly those that require shot peening or powder coating, and accordingly struggle to supply them in a timely manner.[142] Alcomex asserts it entered the U.S. market in 2022 in response to a demand for such products,[143] and that it continued to supply overhead door springs to a limited number of customers in 2022 and 2023 based on demand created by shortages in the market.[144]

AlumaDoor contends that the domestic industry's price increases, quantity limitations, and dimensional limitations demonstrate a significant deficit of capacity and resources to meet current demand.[145] According to AlumaDoor, the domestic industry has a history of repeated order delays, which have caused some of its U.S. customers to seek complete doors from alternative garage door suppliers.[146]

3. Substitutability and Other Conditions

Based on the record in the preliminary phase of these investigations, we find that there is a high degree of substitutability between domestically produced overhead door springs and cumulated subject imports.[147] All U.S. producers and nearly all importers reported that domestically produced overhead door springs and overhead door springs imported from China and India are always or frequently interchangeable.[148]

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[140] CR/PR at II-5, Tables IV-9, C-1; Pet. Postconference Br. at 14.

[141] CR/PR at IV-18, Tables IV-9, C-1.

[142] Alcomex Postconference Br. at 2-3. Several producers indicated that they either have these capabilities in house or can have them conducted by outside processors. Conf. Tr. at 65 (Boldenow): Pet. Postconference Br., Exh. 4 (Boldenow Decl., pg. 2, para. 7).

[143] Alcomex Postconference Br. at 2.

[144] Alcomex Postconference Br. at 2.

[145] AlumaDoor Postconference Br. at 2.

[146] AlumaDoor Postconference Br. at 3.

[147] CR/PR at II-9.

[148] CR/PR at II-11, Table II-8.

We find that price is an important factor in purchasing decisions. Responding purchasers most frequently cited price, quality and lead times as the top three factors influencing their purchasing decisions.[149] Quality and price were most frequently reported as the most important factors (six firms each), followed by lead times (two firms).[150] Quality was the most frequently cited first-most important factor (cited by four firms), followed by price (two firms); quality and price were the most frequently reported second-most important factors (two firms each); and price and lead times were the most frequently reported third-most important factors (two firms each).[151]

U.S. producers reported selling most of their overhead door springs in the spot market (*** percent of commercial U.S. shipments in 2023), with the remainder sold under annual contracts (*** percent) and short-term contracts (*** percent).[152] U.S. importers reported selling most of their overhead door springs in the spot market (*** percent), with the remainder sold under long-term contracts (*** percent).[153] Petitioners reported average lead times of approximately one week in 2023 for nearly 80 percent of their shipments that are produced to order, and one or two days for shipments from inventory.[154] Importers reported lead times averaging five or six days for shipments from inventory, which accounted for more than 95 percent of their commercial shipments in 2023, and more than three weeks for merchandise produced to order.[155]

The price for high-carbon steel wire rod (the primary input for the wire used to produce overhead door springs) increased by *** percent from January 2021 to April 2022, then declined irregularly by *** percent through October 2024.[156] Raw materials' share of U.S. producers' cost of goods sold ("COGS") increased slightly from *** percent in 2021 to *** percent in 2022, then decreased to *** percent in 2023, and was *** percent in interim 2024. Half of the U.S. producers and most responding importers reported that the cost of raw materials steadily increased or fluctuated upward.[157] They added that prices for every other input – *e.g.*, energy, labor, employee benefits, commercial property liability insurance,

[149] CR/PR at II-9, Table II-7.
[150] CR/PR at II-9, Table II-7.
[151] CR/PR at II-9, Table II-7.
[152] CR/PR at V-4, Table V-3.
[153] CR/PR at V-4, Table V-3.
[154] CR/PR at II-10.
[155] CR/PR at II-10.
[156] CR/PR at Figure V-1; Table V-1.
[157] CR/PR at V-1.

consumables, torch tips, forklift, and repairs – have increased over the last several years.[158] Firms generally reported that costs that rose during the pandemic have been slow to come down due to softer demand and inflation.[159]

Effective September 1, 2019, overhead door springs originating in China were subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the duties were reduced to 7.5 percent.[160]

Torsion springs for overhead door lifting systems are not subject to the additional 25 percent duty on derivative steel articles under section 232 of the Trade Expansion Act of 1962.[161] The steel wire used to produce these springs and the wire rod from which the wire is drawn are subject to the section 232 additional duty, but such imports from some countries of origin are granted duty exemptions, absolute quotas, or tariff rate quotas.[162]

According to Petitioners, some major purchasers import subject overhead door springs directly from each of the subject countries for use in garage door manufacturing.[163] They note that *** importers reported import purchase cost data that collectively accounted for *** percent of the reported pricing data.[164] Petitioners assert that this direct sourcing of imports intensifies the competitive price effects of the subject imports, as U.S. producers are forced to compete with extremely low prices that foreign producers offer directly to U.S. purchasers.[165]

Alcomex claims that although the domestic industry can provide "most things within five days," that is not quick enough to meet the *** lead times required by many purchasers.[166] It finds support for this assertion in U.S. producers' statements at the staff conference that "we're competing on lead time" and "we're losing sales because of lead time."[167] Alcomex contends that it maintains *** to ensure that it is able to provide needed product more quickly.[168]

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[158] CR/PR at V-1.

[159] CR/PR at V-1.

[160] CR/PR at I-8.

[161] 19 U.S.C. § 1862; CR/PR at I-8.

[162] CR/PR at I-8.

[163] Pet. Postconference Br. at 16.

[164] Pet. Postconference Br. at 16, Exh. 13; *see also* CR/PR at Tables V-14 (instances of underselling/overselling by source), V-17 (instances of lower and higher import purchase costs by source).

[165] Pet. Postconference Br. at 16.

[166] Alcomex Postconference Br. at 3.

[167] Alcomex Postconference Br. at 4, *citing* Conf. Tr. at 85 (Cannon), 104 (Bianco).

[168] Alcomex Postconference Br. at 3.

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."[169]

The volume of cumulated subject imports increased from *** pounds in 2021 to *** pounds in 2022, before declining to *** pounds in 2023, for an overall increase of *** percent.[170] The volume of cumulated subject imports was *** percent higher in interim 2024 at *** pounds, than in interim 2023, at *** pounds.[171]

Cumulated subject import's share of apparent U.S. consumption increased over the POI, from *** percent in 2021 to *** percent in 2023, for an overall increase of *** percentage points over the three full years of the POI.[172] Cumulated subject imports' market share was *** percentage points higher in interim 2024, at *** percent, than in interim 2023, at *** percent.[173]

Based on the record of this preliminary phase of these investigations, we find that the volume of cumulated subject imports and the increase in that volume are significant, both in absolute terms and relative to consumption in the United States.

D. Price Effects of the Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of 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.[174]

[169] 19 U.S.C. § 1677(7)(C)(i).
[170] CR/PR at IV-18, Tables IV-9, C-1.
[171] CR/PR at IV-18, Tables IV-9, C-1.
[172] CR/PR at IV-18, Tables IV-9, C-1.
[173] CR/PR at IV-18, Tables IV-9, C-1.
[174] 19 U.S.C. § 1677(7)(C)(ii).

As discussed in section VII.B.3 above, we find that there is a high degree of substitutability between the domestic like product and cumulated subject imports and that price is an import factor in purchasing decisions for overhead door springs.[175]

The Commission collected quarterly f.o.b. pricing data on shipments of four types of overhead door springs to unrelated U.S. customers during the period of investigation.[176] Four U.S. producers and five importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[177] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of overhead door springs, *** percent of subject imports from China and *** percent of subject imports from India from January 2021 to June 2024.[178]

Prices for overhead door springs from China and India were below those for U.S.-produced overhead door springs in 25 of 30 instances (or 83.3 percent); margins of underselling ranged from *** to *** percent, with an average margin of *** percent.[179] In the remaining 5 instances (representing 16.7 percent of reported instances of subject imports in the pricing data), prices for overhead door springs from China and India were between *** and *** percent of reported total pounds of subject imports in the pricing data), with an average margin of *** percent.[180] The volume of subject import sales in quarters with underselling was *** pounds, representing *** percent of the total volume of subject imports of the pricing products, compared to *** pounds in the quarters with overselling, representing *** percent of the total.[181] These data demonstrate pervasive underselling by subject imports.

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[175] *See* section VII.B.3 above.

[176] CR/PR at V-5. These four pricing products were: (1) Product 1: residential garage door torsion spring with the following characteristics: (a) wire diameter 0.207" – 0.234", (b) inner diameter 1.750" – 2.625", (c) overall length 20" – 40", (d) left wound or right wound, (e) description stenciled on spring, (f) aluminum castings/cones installed; (2) Product 2: residential garage door torsion spring with the following characteristics: (a) wire diameter 0.243" – 0.262", (b) inner diameter 1.750" – 2.625", (c) overall length 20" – 40", (d) left wound or right wound, (e) description stenciled on spring, (f) aluminum castings/cones installed; (3) Product 3: commercial garage door torsion spring with the following characteristics: (a) wire diameter 0.273" – 0.362", (b) inner diameter 2.500" – 6.000", (c) overall length 35" – 65", (d) left wound or right wound, (e) description stenciled on spring, (f) aluminum castings/cones installed; and (4) Product 4: long length spring with the following characteristics: (a) wire diameter 0.192" – 0.437", (b) inner diameter 1.750" – 6.000", (c) overall length 96" – 144", (d) left wound or right wound, (e) description stenciled on spring, (f) plain ends – no aluminum castings/cones installed. *Id*.

[177] CR/PR at V-6.

[178] CR/PR at V-6.

[179] CR/PR at V-25, Table V-13.

[180] CR/PR at V-25, Table V-13.

[181] CR/PR at V-25, Table V-13.

The Commission also collected import purchase cost data from firms that imported these products for their own use or retail sale.[182] Five importers reported usable purchase cost data for pricing products 1 through 4 on a landed, duty-paid ("LDP") basis.[183] Purchase cost data reported by these firms accounted for *** percent of imports from China and *** percent of imports from India from January 2021 to June 2024.[184]

LDP costs for overhead door springs imported from China and India were below the sales price for U.S.-produced product in all 32 comparisons (*** pounds); price-cost differentials ranged from *** to *** percent and averaged *** percent.[185]

We recognize that import purchase cost data may not reflect the total cost of importing.[186] Therefore, we requested that importers provide additional information regarding the costs and benefits of importing overhead door springs themselves.[187] Two of eight importers reported that they incurred additional costs beyond landed duty paid costs by importing overhead door springs themselves rather than purchasing from a U.S. producer or U.S. importer. [188] Of these, one importer (***) estimated the total additional cost incurred to be 17 percent compared to the landed, duty-paid value. [189]

Eight importers identified benefits from importing overhead door springs themselves instead of purchasing from U.S. producers or importers, including getting the supply of overhead springs needed to fulfill orders when U.S. producers would not sell, stable supply chain, cost savings, and better quality.[190] Firms were also asked whether the import cost (both excluding and including additional costs) of overhead door springs they imported are lower than the price of purchasing overhead door springs from a U.S. producer or importer.[191] Seven importers reported that their import cost not including additional costs is lower than U.S.

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[182] CR/PR at V-15, V-27. Landed duty-paid purchase cost data for imports from China and India are presented in Tables V-8 to V-10, along with U.S. producers' sales prices. *Id*. at Tables V-8—V-10.

[183] CR/PR at V-15.

[184] CR/PR at V-15, V-27.

[185] CR/PR at V-27, Table V-16.

[186] CR/PR at V-15.

[187] CR/PR at V-15.

[188] CR/PR at V-15.

[189] CR/PR at V-15. Firms were also asked to identify specific additional costs they incurred as a result of importing overhead door springs. *Id*. Importer *** reported shipping costs equivalent to 20 percent of the landed, duty-paid cost. *Id*. It also reported research costs, specifically spending weeks finding producers of overhead door springs, traveling to their factories in China, product testing, and establishing trade solutions, all of which it had not had to do when it only purchased U.S. overhead door springs. *Id*.

[190] CR/PR at V-16.

[191] CR/PR at V-16.

producers and importers, and six importers reported their import cost is lower when including additional costs.[192] One importer estimated that it saved *** percent of the purchase price by importing overhead door springs rather than purchasing from a U.S. importer, and five importers reported saving between *** percent compared to purchasing the product from a U.S. producer. [193] Thus, importers generally reported that there were cost benefits associated with such importing.

We have also considered purchasers' responses to the lost sales/lost revenue survey.[194] Of the six responding purchasers, five reported that, since 2021, they have purchased imported overhead door springs from China (three firms) and India (three firms) instead of U.S.-produced product.[195] Four of these purchasers reported that subject 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.[196] Two purchasers estimated the quantity of overhead door springs from China and India purchased instead of domestic product; quantities ranged from *** pounds (with respect to China) to *** pounds (with respect to India).[197]

Based on the foregoing, including the high degree of substitutability between domestically produced overhead door springs and cumulated subject imports from China and India, the importance of price in purchasing decisions for overhead door springs, the available pricing and purchase cost data, and lost sales information, we find, for purposes of these preliminary determinations, that underselling by cumulated subject imports from China and India was significant. The pervasive underselling during the period of investigation led subject imports to gain market share at the expense of the domestic industry during the POI. Subject imports gained *** percentage points of market share from 2021 to 2023, and an additional *** percentage points of market share from the domestic industry over the interim periods.[198]

[192] CR/PR at V-16.
[193] CR/PR at V-16.
[194] CR/PR at V-30.
[195] CR/PR at V-30.
[196] CR/PR at V-30.
[197] CR/PR at V-30, Table V-21.
[198] CR/PR at IV-18, Tables IV-9, C-1. We note that the subject imports gained additional market share *** during the interim period as compared to the full three-year period. *See id*. As noted, the subject imports gained *** percentage points of market share from 2021 to 2023. *Id*. The subject imports' market share was *** percentage points higher in interim 2024, *i.e.*, it was *** percent in interim 2024, and *** percent in interim 2023. *Id*.

We have also considered price trends during the POI. U.S. producer prices increased substantially from the first quarter of 2021 to the second quarter of 2022 before steadily declining until the second quarter of 2024.[199] Domestic prices for pricing product 1 peaked in the second quarter of 2022 and then steadily declined.[200] Domestic prices for pricing product 2 peaked in the second quarter of 2022 and then fluctuated down.[201] Domestic prices for pricing product 3 peaked in the third and fourth quarters of 2022 and then fluctuated down.[202] Domestic prices for pricing product 4 peaked in the second quarter of 2022 and then fluctuated down.[203]

Import price and purchase cost data were too sporadic to discern any particular trends.[204] We note that the subject imports' average unit values ("AUVs") were also sporadic over the POI.[205] Their AUVs fluctuated over the POI, but declined overall, decreasing from $*** in 2021 to $*** in 2022, increasing to $*** in 2023. They were higher in interim 2024 at $*** than in interim 2023 at $***.[206]

While domestic producer prices for each of the four pricing products increased overall during the POI, domestic producer prices declined from the peak attained in varying quarters of 2022 through the end of the POI, as detailed above. At the same time, apparent U.S. consumption declined by *** percent between 2022 and 2023 (although it increased by *** percent over the interim periods)[207] and raw material costs, which constituted the majority of the domestic industry's COGS throughout the POI, also declined between 2022 and 2023 (as well as over the interim periods).[208] However, while raw material and other costs declined from 2022 to 2023, the domestic industry's net sales AUVs declined to a greater degree leading to an increase of the domestic industry's COGS- to – net sales ratio,[209] suggesting that declining raw material costs do not account for the extent of domestic producer price declines. Further in the interim period, the domestic industry's COGS to net sales ratio increased further even as demand increased by *** percent.[210] Based on the foregoing, for purposes of these

[199] CR/PR at V-24, Figure V-9, Table V-12.
[200] CR/PR at Figure V-9, Table V-12.
[201] CR/PR at Figure V-9, Table V-12.
[202] CR/PR at Figure V-9, Table V-12.
[203] CR/PR at Figure V-9, Table V-12.
[204] CR/PR at V-23.
[205] CR/PR at Table C-1.
[206] CR/PR at Table C-1.
[207] CR/PR at Table C-1.
[208] CR/PR at Table VI-1.
[209] CR/PR at Table VI-1.
[210] CR/PR at Tables VI-1, C-1.

preliminary phase investigations, we cannot find that the cumulated subject imports did not depress domestic producer prices to a significant degree.

We have also examined whether subject imports prevented price increases for domestically produced overhead door springs which otherwise would have occurred. The domestic industry's COGS-to-net-sales ratio increased irregularly, decreasing from *** percent in 2021 to *** percent in 2022, then increasing to *** percent in 2023, for an overall increase of *** percentage points. The COGS-to-net sales ratio was *** percentage points higher in interim 2024, at *** percent, than in interim 2023, at *** percent.[211] The domestic industry's raw material costs per unit increased irregularly, increasing from $*** in 2021 to $*** in 2022, before decreasing to $*** in 2023, for an overall increase of $*** per unit, or *** percent.[212] The industry's per unit COGS increased from $*** in 2021 to $*** in 2022 and then decreased to $*** in 2023, for an overall increase of $***, or *** percent.[213] The domestic industry's net sales AUV increased from $*** in 2021 to $*** in 2022, and then decreased to $*** in 2023, for an overall increase of $***, or *** percent.[214] Its net sales AUV was *** percent lower in interim 2024, at $***, than in interim 2024, at $***.[215]

Thus, from 2021 to 2023 the increase in the domestic industry's net sales AUVs exceeded the increase in its unit costs; however, from 2022 to 2023 and over the interim periods, the decline in the domestic industry's net sales AUVs exceeded its decline in unit costs.[216] These movements occurred as apparent U.S. consumption declined during the full three-year period, with apparent U.S. consumption fluctuating over the POI ending *** percent lower in 2023 than in 2021 but *** percent higher in interim 2024 than in interim 2023.[217] In any final phase of these investigations, we intend to examine further whether and to what extent subject imports may have prevented domestic price increases that would have otherwise occurred.

In sum, for purposes of these preliminary phase investigations, we find that subject imports significantly undersold the domestic like product and gained market share at the expense of the domestic industry, and we cannot find that subject imports did not have price

[211] CR/PR at Table C-1.
[212] CR/PR at Tables VI-1—V-2.
[213] CR/PR at Tables VI-1—V-2, C-1.
[214] CR/PR at Tables VI-1—V-2, C-1.
[215] CR/PR at Tables VI-1, C-1.
[216] CR/PR at Tables VI-1—V-2.
[217] CR/PR at Tables VI-1, C-1.

depressing effects on domestic prices. Consequently, we find that subject imports had significant price effects.

E. Impact of the Subject Imports[218]

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, "shall evaluate all relevant economic factors which have a bearing on the state of the industry." These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debt, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[219]

Most of the domestic industry's trade, employment, and financial indicators generally weakened during the POI, and many indicators continued to worsen in interim 2024. The domestic industry's overhead door springs capacity increased by *** percent from 2021 to 2023, from *** pounds in 2021 to *** pounds 2023; it was *** percent lower in interim 2024, at *** pounds, than in interim 2023 at *** pounds.[220] Its production of overhead door springs decreased *** percent from 2021 to 2023, from *** pounds in 2021 to *** pounds in 2022 and *** pounds in 2023; production was *** percent higher in interim 2024, at *** pounds, than in interim 2023, at *** pounds.[221] The industry's capacity utilization decreased by *** percentage points from 2021 to 2023, from *** percent in 2021 to *** percent in 2022 and to *** percent in 2023; it was *** percentage points higher in interim 2024, at *** percent, than in interim 2023, at *** percent.[222]

The domestic industry's employment-related indicators were generally mixed between 2021 and 2023, but experienced declines in the latter portion of the POI. The number of production and related workers ("PRWs") was *** percent higher in 2023 than in 2021.[223] The number of PRWs increased from *** in 2021 to *** in 2022, and decreased to *** in 2023; the

[218] Commerce initiated investigations based on estimated dumping margins of 669.36 to 778.31 percent for imports from China, and 46.75 to 126.14 percent for imports from India. *AD Initiation Notice*, 89 Fed. Reg. at 92898 (AD margins for China and India).

[219] 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

[220] CR/PR at Tables III-7, C-1.

[221] CR/PR at Tables III-7, C-1.

[222] CR/PR at Tables III-7, C-1.

[223] CR/PR at Tables III-12, C-1.

number of PRWs was *** higher in interim 2024, at *** PRWs, than in interim 2023, at *** PRWs.[224] The industry's total hours worked was *** percent higher in 2023 than in 2021, increasing from *** hours in 2021 to *** hours in 2022 and decreasing to *** in 2023; total hours were *** percent lower in interim 2024, at *** hours, than in interim 2023, at *** hours.[225] Wages paid were *** percent higher in 2023 than in 2021, increasing from $*** in 2021 to $*** in 2022, then decreasing to $*** in 2023; they were *** percent higher in interim 2024, at $***, than in interim 2023, at $***.[226] Productivity decreased by *** percent from 2021 to 2023, decreasing from *** units per hour in 2021 to *** units per hour in 2022, and decreasing to *** units per hour in 2023; it was *** percent higher in interim 2024, at *** units per hour, than in interim 2023, at *** units per hour.[227]

The domestic industry's U.S. shipments decreased by *** percent from 2021 to 2023, increasing from *** pounds in 2021 to *** pounds in 2022, and decreasing to *** pounds in 2023; its U.S. shipments were *** percent higher in interim 2024, at *** pounds, than in interim 2023, at *** pounds.[228] The industry's share of apparent U.S. consumption decreased by *** percentage points from 2021 to 2023, decreasing from *** percent in 2021 to *** percent in 2022, and increasing to *** percent in 2023; it was *** percentage points lower in interim 2024, it was *** percent in interim 2024, and *** percent in interim 2023.[229]

The domestic industry's end-of-period inventories decreased by *** percent from 2021 to 2023, from *** pounds in 2021 to *** pounds in 2022 and then to *** pounds in 2023; they were *** percent lower in interim 2024, at *** pounds, than in interim 2023 at *** pounds.[230] As a share of total shipments, the domestic industry's end-of-period inventories decreased irregularly by *** percentage points from 2021 to 2023, decreasing from *** percent in 2021 to *** percent in 2022, and then increasing to *** percent in 2023; they were *** percentage points lower in interim 2024, at *** percent, than in interim 2023, at *** percent.[231]

While the domestic industry's financial performance improved somewhat from 2021 to 2022, it worsened in the later part of the POI. The industry's net sales revenues increased irregularly by *** percent from 2021 to 2023, rising from $*** in 2021 to $*** in 2022, before declining to $*** in 2023; net sales revenues were *** percent lower in interim 2024, at $***,

[224] CR/PR at Tables III-12, C-1.
[225] CR/PR at Tables III-12, C-1.
[226] CR/PR at Tables III-12, C-1.
[227] CR/PR at Tables III-12, C-1.
[228] CR/PR at Tables III-8, C-1.
[229] CR/PR at Tables IV-9, C-1.
[230] CR/PR at Tables III-9, C-1.
[231] CR/PR at Tables III-9, C-1.

than in interim 2023, at $***.[232] Its gross profits increased by *** percent between 2021 and 2023, rising from $*** in 2021 to $*** in 2022, and then falling to $*** in 2023; gross profits were *** percent lower in interim 2024, at $***, than in interim 2023, at $***.[233] The industry's operating income decreased *** percent from 2021 to 2023, increasing from $*** in 2021 to $*** in 2022, and then decreasing to $*** in 2023; the industry's operating income was *** percent lower in interim 2024, at $***, than in interim 2023, at $***.[234] The domestic industry's operating income as a ratio of net sales decreased by *** percentage points from 2021 to 2023, it increased from *** percent in 2021 to *** percent in 2022, and decreasing to *** percent in 2023; it was *** percentage points lower in interim 2024, at *** percent than in interim 2023, at ***.[235] Its net income decreased by *** percent from 2021 to 2023, increasing from $*** in 2021 to $*** in 2022, and then falling to $*** in 2023; the industry's net income was *** percent lower in interim 2024, at $***, than in interim 2023, at $***.[236] The industry's net income as a ratio of net sales decreased by *** percentage points from 2021 to 2023, increasing from *** percent in 2021 to *** percent in 2022, and decreasing to *** percent in 2023; it was *** percentage points lower in interim 2024, at *** percent, than in interim 2023, at *** percent.[237]

The domestic industry's capital expenditures increased irregularly by *** percent from 2021 to 2023, increasing from $*** in 2021 to $*** in 2022, and then decreasing to $*** in 2023; they were *** percent lower in interim 2024, at $***, than in interim 2023, at $***.[238] The industry's research and development ("R&D") expenses increased *** percent from 2021 to 2023, increasing from $*** in 2021 to $*** in 2022 and then to $*** in 2023; they were *** percent lower in interim 2024, at $***, than in interim 2023, at $***.[239] The domestic industry's return on assets increased from *** percent in 2021 to *** percent in 2022, and then decreased to *** percent in 2023.[240]

As discussed above, cumulated subject import volume and market share increased significantly and at the expense of the domestic industry over the POI, driven by significant underselling throughout the POI. Over the full years of the POI, the industry's output indicators

[232] CR/PR at Tables VI-1, C-1.
[233] CR/PR at Tables VI-1, C-1.
[234] CR/PR at Tables VI-1, C-1.
[235] CR/PR at Tables VI-1, C-1.
[236] CR/PR at Tables VI-1, C-1.
[237] CR/PR at Tables VI-1, C-1.
[238] CR/PR at Tables VI-4, C-1.
[239] CR/PR at Tables VI-4, C-1.
[240] CR/PR at Table VI-4.

(*i.e.*, production, net sales and U.S. shipments) declined by a greater rate than consumption, as subject imports gained market share at the expense of the domestic industry. Likewise, as consumption increased over the interim periods, the industry's output indicators increased at a slower rate than consumption, again as subject imports gained market share at the expense of the domestic industry.[241] This occurred as highly substitutable subject imports, for which price is an important purchasing factor, pervasively undersold the domestic like product. We thus find that the domestic industry performed worse than it otherwise would have but for the significant volume of subject imports that undersold the domestic like product to a significant degree. In addition, as discussed in section VII.D, we cannot conclude that subject import underselling did not depress domestic producer prices to a significant degree and therefore had negative effects on the domestic industry's financial performance.

Consequently, we find that cumulated subject imports had a significant adverse 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. As discussed, there were no nonsubject imports during the POI.[242] Therefore, nonsubject imports do not explain the declines in the domestic industry's market share or declining performance indicators during the POI.[243]

Although apparent U.S. consumption declined overall from 2021 to 2023 by *** percent, this *** decline cannot explain cumulated subject imports' market share gains at the expense of the domestic industry, which resulted in reductions in production quantity, capacity utilization, and revenue that would not otherwise have occurred in the absence of the subject imports.

Respondent Alcomex asserts that domestic producers cannot meet certain technical specifications for particular products, and that domestic producers are unable to meet the short lead times required by downstream users.[244] Respondent AlumaDoor argues that certain domestic producers' actions - including a refusal to sell to particular purchasers, delays in deliveries, and imposition of "unreasonable" price increases – are the cause of any domestic industry difficulties.[245] Both Alcomex and AlumaDoor also contend that imports were

[241] CR/PR at Tables III-7, IV-1, C-1.
[242] CR/PR at II-5, Tables IV-9, C-1; Pet. Postconference Br. at 14.
[243] CR/PR at Tables III-7, IV-1, C-1.
[244] Alcomex Postconference Br. at 2-4.
[245] AlumaDoor Postconference Br. at 2-4.

necessary due to supply shortages in the U.S. market.[246] In any final phase investigation, we will examine these assertions in greater detail. In sum, based on the record in the preliminary phase of these investigations, we find that subject imports had a significant adverse impact on the domestic industry.

VIII. Conclusion

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of subject imports of overhead door springs from China and India that are allegedly subsidized and sold in the United States at less than fair value.

[246] *See* Alcomex Postconference Br. at 2; AlumaDoor Postconference Br. at 5.

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce ("Commerce") and the U.S. International Trade Commission ("USITC" or "Commission") by IDC Group, Inc. ("IDC Spring"), Minneapolis, Minnesota, Iowa Spring Manufacturing, Inc. ("Iowa Spring"), Adel, Iowa, and Service Spring Corp. ("Service Spring"), Maumee, Ohio (collectively, "Petitioners"), on October 29, 2024, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value ("LTFV") imports of overhead door counterbalance torsion springs ("overhead door springs")[1] from China and India. Table I-1 presents information relating to the background of these investigations.[2] [3]

Table I-1
Overhead door springs: Information relating to the background and schedule of this proceeding

Effective date	Action
October 29, 2024	Petitions filed with Commerce and the Commission; institution of the Commission investigations (89 FR 87598, November 4, 2024)
November 18, 2024	Commerce's notice of initiation of LTFV investigations (89 FR 92895, November 25, 2024)
November 18, 2024	Commerce's notice of initiation of countervailing duty investigations (89 FR 92901, November 25, 2024)
November 19, 2024	Commission's conference
December 12, 2024	Commission's vote
December 13, 2024	Commission's determinations
December 20, 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] A list of witnesses appearing at the conference is presented in appendix B of this report.

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

Market summary

Overhead door springs provide the lifting force for counterbalance lift systems in applications such as residential and commercial garage doors, industrial rolling doors, and truck and trailer doors, among others. The leading U.S. producers of overhead door springs are IDC Spring, Iowa Spring, and Service Spring, while leading producers of overhead door springs outside the United States include Tianjin Wangxia Spring Co. Ltd. of China and Alcomex Springs Pvt. Ltd. of India ("Alcomex Springs").[6] The leading U.S. importer of overhead door springs from China is ***, while the leading importer of overhead door springs from India is ***. Based on responses to the Commission's questionnaire, and information provided in the petition, there were no imports of overhead door springs from nonsubject sources in 2023. U.S. purchasers of overhead door springs are end users involved in the manufacture and installation of residential garage doors, commercial

[5] Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.
[6] Petitioners' staff conference testimony, Attachment 2, p. 30.

overhead doors, rolling or curtain doors, and truck and trailer doors, that purchase overhead door springs as a component part, as well as distributors and dealers of overhead door springs; leading purchasers include ***.[7]

Apparent U.S. consumption of overhead door springs totaled approximately *** pounds ($***) in 2023. Currently, as many as eight firms are believed to produce overhead door springs in the United States.[8] U.S. producers' U.S. shipments of overhead door springs totaled *** pounds ($***) in 2023, and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled *** pounds ($***) in 2023 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. There were no U.S. imports from nonsubject sources in any annual or partial period.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of four firms that accounted for the large majority of U.S. production of overhead door springs during 2023. U.S. imports are based on questionnaire responses submitted to the Commission for imports from India, and imports from China are based on a combination of information submitted in the petition and official Commerce statistics.[9]

Previous and related investigations

Overhead door springs have not been the subject of any prior countervailing or antidumping duty investigations in the United States.

[7] Conference transcript, pp. 10 (Boldenow), 19 (McAlear), 24 (Bianco).

[8] Petition pp. 3-4. Four firms in addition to the petitioners indicated that they are a domestic producer of overhead door springs: Penn Central Spring – Alto Door Holdings, Overhead Door Corporation, Dura-Lift Hardware, and Napoleon Spring Works. More information on these firms is provided in Part III of this report. American Spring, Inc., which was listed in the petition as a possible U.S. producer of overhead door springs, did not respond to staff outreach.

[9] For more information on the sources of information on imports from China, please see Part IV of this report.

Nature and extent of alleged subsidies and sales at LTFV

Alleged subsidies

On November 25, 2024, Commerce published a notice in the Federal Register of the initiation of its countervailing duty investigations on overhead door springs from China and India.[10]

Alleged sales at LTFV

On November 25, 2024, Commerce published a notice in the Federal Register of the initiation of its antidumping duty investigations on overhead door springs from China and India.[11] Commerce has initiated antidumping duty investigations based on estimated dumping margins of 669.36 to 778.31 percent for overhead door springs from China and 46.75 to 126.14 percent for overhead door springs from India.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:[12]

> *The merchandise covered by these investigations is helically-wound, overhead door counterbalance torsion steel springs ("overhead door counterbalance torsion springs") and any cones, plugs or other similar fittings for mounting and creating torque in the spring (herein collectively referred to as "cones") attached to or entered with and invoiced with the subject overhead door counterbalance torsion springs. Overhead door counterbalance torsion springs are helical steel springs with tightly wound coils that store and release mechanical energy by winding and unwinding along the spring's axis by an angle, using torque to create a lifting force in the counterbalance assembly typically used to raise and lower overhead doors, including garage doors, industrial rolling doors, warehouse doors, trailer doors, and other overhead doors, gates, grates, or similar devices.*

[10] For further information on the alleged subsidy programs see Commerce's notice of initiation and related CVD Initiation Checklist. 89 FR 92901, November 25, 2024.

[11] 89 FR 92895, November 25, 2024.

[12] 89 FR 92895 and 89 FR 92901, November 25, 2024. Petitioners' Amendment to the Scope of the Petition for the Imposition of Antidumping and Countervailing Duties on Imports from China and India, EDIS Doc. 837389 (November 15, 2024).

The merchandise covered by these investigations covers all overhead door counterbalance torsion springs with a coil inside diameter of 15.8 millimeters ("mm") or more but not exceeding 304.8 mm (measured across the diameter from inner edge to inner edge); a wire diameter of 2.5 mm to 20.4 mm; a length of 127 mm or more; and regardless of the following characteristics:

- *wire type (including, but not limited to, oil-tempered wire, hard-drawn wire, music wire, galvanized or other coated wire);*
- *wire cross-sectional shape (e.g., round, square, or other shapes);*
- *coating (e.g., uncoated, oil- or water-based coatings, lubricant coatings, zinc, aluminum, zinc-aluminum, paint or plastic coating, etc.);*
- *winding orientation (left-hand or right-hand wind direction);*
- *end type (including, but not limited to, looped, double looped, clipped, long length, mini warehouse, Barcol, Crawford, Kinnear, Wagner, rolling steel or barrel ends); and*
- *whether the overhead door counterbalance torsion springs are fitted with hardware, including but not limited to fasteners, clips, and cones (winding or stationary cones).*

For purposes of the diameters referenced above, where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definitions set forth above.

The steel torsion springs included in the scope of these investigations are produced from steel in which: (1) iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less, by weight.

Subject merchandise also includes all subject overhead door counterbalance torsion springs and cones or other similar fittings for mounting and tensioning the spring entered as a part of overhead door kits, overhead door mounting or assembly kits, or as a part of a spring-operated motor assembly or as a part of a spring winder assembly kit for torsion springs. When counterbalance torsion springs and cones or other similar fittings for attaching and tensioning the torsion spring are entered as a part of such kits, only the counterbalance spring and cones or other similar fittings in the kit are within scope.

Subject merchandise also includes overhead door counterbalance torsion springs that have been further processed in a third country, including but not limited to cutting to length, attachment of hardware, cones or end-

fittings, inclusion in garage door kits or garage door mounting or assembly kits, or any other processing that would not remove the merchandise from the scope of these orders if performed in the country of manufacture of the in-scope overhead door counterbalance torsion springs.

All products that meet the written physical description are within the scope of these investigations unless specifically excluded. The following products are specifically excluded from the scope of these investigations:

- *leaf springs (slender arc-shaped length of spring steel of a rectangular cross-section);*
- *disc springs (conical springs consisting of a convex disc with the outer edge working against the center of the disc);*
- *extension springs (close-wound round helical wire springs that store and release energy by resisting the external pulling forces applied to the spring's ends in the direction of its length);*
- *compression springs (helical coiled springs with open wound active coils (such open winding is also known as pitch) that are designed to compress under load or force); and*
- *spiral springs (torsion springs wound as concentric spirals such as a clock spring or mainspring).*

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations are imported under the following provisions of the Harmonized Tariff Schedule of the United States ("HTSUS" or "HTS"): 7320.20.5020, 7320.20.5045, and 7320.20.5060.[13] The 2024 general rate of duty is 3.9 percent

[13] These HTS statistical reporting numbers for helical springs, other than those suitable for motor-vehicle suspensions, also include nonsubject products used in applications other than as counterbalance tension springs for overhead door overhead doors. The subject merchandise may also be imported under HTS statistical reporting number 8412.90.9085 (other parts of other engines and motors, not elsewhere classified or identified) if entered as parts of spring-operated motors. They may also be imported under HTS statistical reporting number 8412.80.1000 (spring-operated and spring-weighted motors) if entered as part of a spring counterweight assembly for an overhead door. They may also be imported under HTS statistical reporting number 7308.90.9590 (other parts of other iron and steel structures, not elsewhere classified or identified), a broad category that includes metal garage doors entered with mounting accessories or assemblies. U.S. shipments of overhead door springs by domestic producers and importers were predominantly reported for wire diameters of 5.1 mm or more but less than 12.7 mm. Subject overhead door springs within this diameter size range are imported under HTS (continued...)

ad valorem for HTS subheading 7320.20.50.[14] Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 1, 2019, overhead door springs originating in China were subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective February 14, 2020, the section 301 duty for imports under these subheadings was reduced to 7.5 percent.[15]

Torsion springs for overhead door lifting systems are not subject to the additional 25 percent duty on derivative steel articles under section 232 of the of the Trade Expansion Act of 1962, as amended.[16] Rather, the input steel wire for these springs and the wire rod from which the wire is drawn are subject to the section 232 additional duty, but such imports from some countries of origin are granted duty exemptions, absolute quotas, or tariff rate quotas.[17]

The product

Description and applications[18]

Overhead door springs are helically wound steel springs that are specifically designed to provide the lifting force for overhead door counterbalance lift systems.[19] These springs are tightly wound as the overhead door is closed and release the stored energy when unwinding to

(…continued)

statistical reporting number 7320.20.5045. Domestic producer questionnaire responses at II-11; importer questionnaire responses at II-5d, II-6d.

[14] USITC, HTSUS (2024) Revision 10, USITC Publication 5569, November 2024, p. 73-37.

[15] See 84 FR 43304, August 20, 2019; 84 FR 45821, August 30, 2019; and 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2024) Revision 10, USITC Publication 5569, November 2024, pp. 73-45, 99-III-88–99-III-89, 99-III-98, 99-III-255–99-III-256 and 99-III-320–99-III-326.

[16] 85 FR 5281, January 29, 2020; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022; 88 FR 13267, March 2, 2023; 88 FR 36437, June 5, 2023; and 89 FR 48233, June 5, 2024.

[17] 83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23421, May 21, 2019; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022; 88 FR 36437, June 5, 2023; 89 FR 227, January 3, 2024; 89 FR 48233, June 5, 2024; and 89 FR 57347, July 15, 2024.

[18] Unless otherwise noted, this information is based on the petition, pp. 8–12.

[19] Overhead door springs are a well-established product and have been in use for over a century since the introduction of section garage doors. Conference transcript, p. 68 (Bianco).

counterbalance the weight of the door, thereby easing the effort needed to raise it. The spring wire is commonly of either tempered high-carbon steel oil-tempered wire (ASTM A229)[20] or hard drawn wire (ASTM A227)[21] of high tensile strength and moderate ductility necessary for durability and the ability to maintain metal memory.[22] However, springs can also be of stainless or other alloy steel grades if requested by customers.[23] Industry standards that guide domestic manufacturing of overhead door springs include these ASTM International specifications for the dimensions and physical properties for the spring wire, Spring Manufacturers Institute ("SMI") specifications for dimensional tolerances for the torsion spring wire, and Door and Access Systems Manufacturing Association ("DASMA") standards for residential garage door counterbalance systems.[24] The cross-sectional shape of the spring wire is most commonly circular but also can be of other shapes. The subject springs are available shot peened, plated, or coated to improve resistance to fatigue, corrosion, and cracking; to enhance the spring's aesthetic appearance; or both.[25] Standard coated springs are commonly sold with a black coating.[26] Overhead door springs are designed to undergo 10,000 or more cycles of being torqued (twisted or wound) followed by the torque being released (untwisted or unwound) over their seven years of service life without metal fatigue or breakage.[27] Shot peening can improve a spring's cycle life by 50 percent from 10,000 cycles to 15,000 cycles.[28] Overhead door springs are coiled in either a left-hand or a right-hand winding direction (figure I-1). The average

[20] Petitioners' postconference brief, exh. 16: ASTM Designation A229 Standard Specification.

[21] Petitioners' postconference brief, exh. 17: ASTM Designation A227 Standard Specification.

[22] Petitioners' postconference brief, p. 4.

[23] Conference transcript, pp. 16–17 (McAlear).

[24] Conference transcript, pp. 68–69 (Boldenow); Petitioners' postconference brief, exh. 14: DASMA Standard for Counterbalance Systems on Residential Sector Garage Doors; exh. 15: Spring Manufacturing Institute Torsion Spring Standards; exh. 16: ASTM Designation A229 Standard Specification; exh. 17: ASTM Designation A227 Standard Specification.

[25] Surfaces of the subject springs are hardened by shot peening. In this process, spherical shot (metallic, glass or ceramic particles) strikes the spring with sufficient force to impart plastic deformation of exposed surfaces, resulting in compression stress and forming layers of compression dimples. Plating materials include zinc, aluminum, or zinc-aluminum. Coating materials include oil- or water-based substances including paints or polymers applied by powder coating or electrophoretic paint coating ("e-coating"). Coatings provide some corrosion protection but do not enhance either the mechanical performance or cycle life of the spring itself. Conference transcript, pp. 18, 41–42 (McAlear).

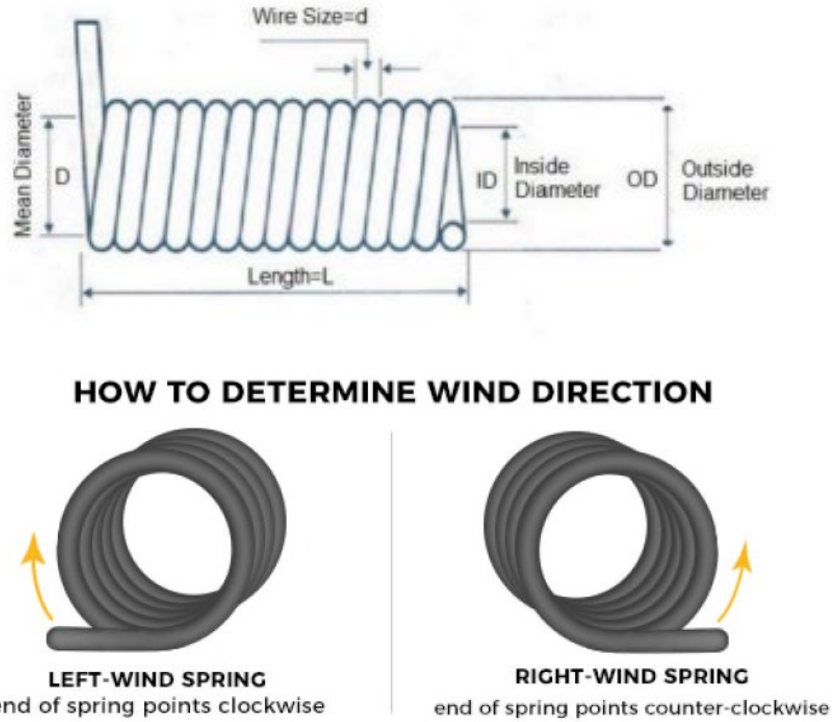
[26] Service Spring sells about 99 percent of its standard coated springs with this type of coating. Conference transcript, p. 41 (McAlear).

[27] Petitioners' postconference brief, p. 5.

[28] Otherwise, another way to improve spring cycle life is to increase the wire size. Conference transcript, pp. 43 (Bianco), 87–88 (McAlear).

residential overhead door spring weighs about 10 pounds and those for commercial applications can weigh 100 pounds or more.[29]

Figure I-1
Overhead door springs: Side and end views



Source: Petition, figures 1 and 2, p. 9.

The ends of overhead door springs are fitted with mounting hardware (commonly referred to as "cones" but also as "plugs," "spring plugs," or "couplers")[30] that are usually of cast aluminum or aluminum alloys but also can be of steel or other metals.[31] Their shapes reflect the different mounting functions at the opposite ends of the spring (figure I-2).[32] The stationary cone secures one end of the spring with nuts and bolts to a mounting bracket affixed to the wall above the overhead door frame. On the other end, the winding cone secures the spring to the rotating torsion shaft. The four radial sockets are for inserting a torsion winding

[29] Conference transcript, p. 55 (Walkup).
[30] Conference transcript, pp. 17–18 (McAlear).
[31] Conference transcript, pp. 18–19 (McAlear).
[32] Individual cones are available in a wide variety of shapes to fit the various end configurations of springs designed for the specific configuration of the door counterbalance system. For further information, see Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, pp. 6–7.

rod (tube) to adjust the spring's tension (rotational force or torque) and then the two set screws (bolts) are tightened to hold the spring in place at the proper tension.[33] The exterior surface of the cone is tapered and threaded to be twisted into the inside of the spring. Frictional contact with the spring coils retains the cones within the ends of the spring. Moreover, as the spring is wound, its diameter shrinks and grips tighter onto the cone to prevent it from sliding out.[34] Both domestic and imported overhead door springs are shipped fitted with cones, although some are shipped without to customers that install the cones themselves.[35] Overhead door springs ten feet or more in length (referred to as "snakes") are available without cones for customers, such as overhead door installers, that cut the spring to custom lengths.[36] [37]

[33] Conference transcript, pp. 37, 71 (McAlear).

[34] Conference transcript, p. 71 (Walkup).

[35] Conference transcript, pp. 18–19 (McAlear).

A petitioners' witness estimated that 90–95 percent or more of tension springs are shipped fitted with cones. Examples of customers that install the cones themselves include OEM manufacturers who purchase the springs in bulk and small firms that repair overhead garage door lifting systems who purchase stock-length springs. Conference transcript, pp. 38 (McAlear), 38–39 (Bianco), 39 (McGrath).

[36] Conference transcript, pp. 17, 38 (McAlear).

[37] Petitioners intended to include within the scope, the cones (or other mounting hardware) as well as the subject springs when they are either (1) already attached to the spring at the time of entry or (2) entered or invoiced with the subject springs. Exporters in China and India frequently invoice and enter longer springs, in uncut lengths of ten feet or more, together with the cones to assemble the intended number of cut-to-length springs. However, separate entries of cones that are not entered or invoiced with the subject springs are not included within the scope of the investigation. Petition, p. 9; Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, pp. 8–9.

Figure I-2
Overhead door springs: End fittings for the opposite ends of the spring

An overhead door spring with the stationary cone fitted on the left and the winding cone fitted on right end

Stationary cone

Winding cone

Source: Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, p. 5. Iowa Spring, "Garage Door Torsion Springs," no date, https://www.iowaspring.com/garage-door-springs/torsion, accessed December 3, 2024.

For other than residential overhead garage doors (e.g., overhead and roller doors for trucks and trailers, commercial and industrial facilities, etc.), there are various other end shapes of springs designed to fit into specially designed end fittings for various specific the door counterbalance systems (figure I-3).[38]

[38] Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, p. 7.

Figure I-3
Overhead door springs: Other end shapes and fittings

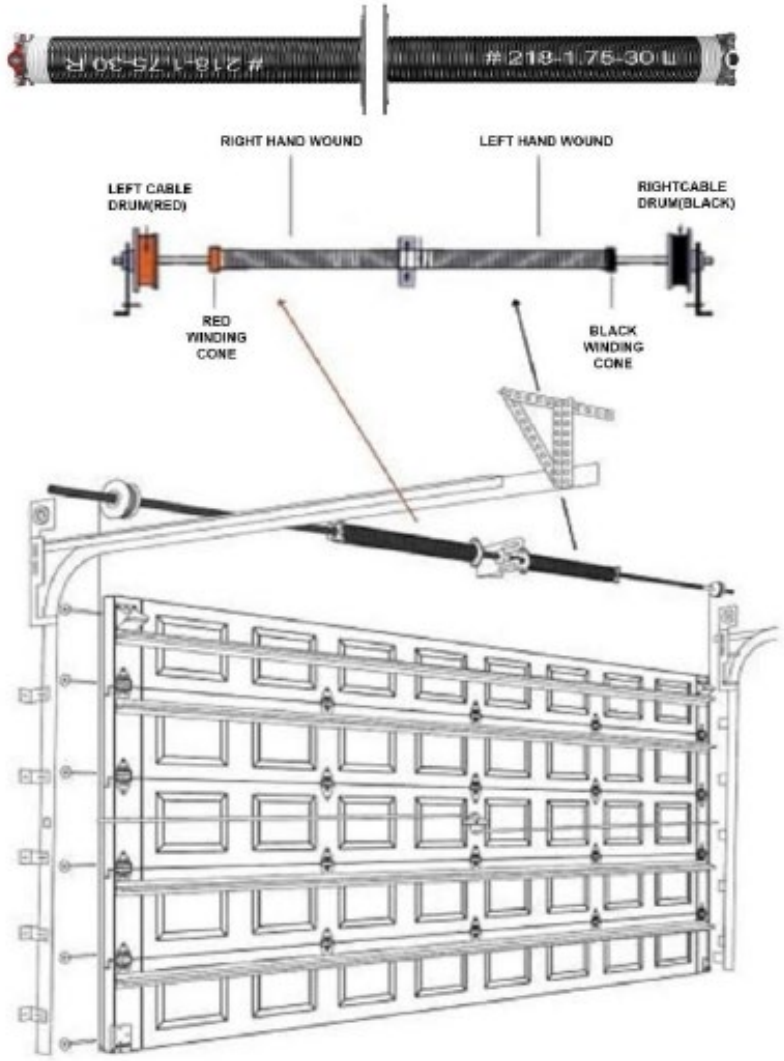
Source: Petition, p. 10; Petitioners' Response to Commerce's Supplemental Questionnaire Regarding Volume I of the Petition, November 7, 2024, p. 7.

Overhead door springs are components of door counterbalance mechanisms that apply opposing forces to open and close overhead or rolling doors and gates, including residential and commercial garage doors, industrial rolling doors, warehouse doors, truck and trailer doors, storage doors, and retail security gates, among others.[39] Whether in standard lift (the most common system for residential garage doors and commercial overhead doors), vertical lift, or high-lift counterbalance systems, overhead door springs exert sufficient force for the weight of an overhead door in the counterbalance lifting assembly. More specifically, the springs store and release mechanical energy: winding up when the door is lowered and unwinding as the door is being raised, to apply torque as the lifting force to ease raising of the door. The spring's torque is conveyed through the rotating torsion shaft and paired drums (reels) on each side to steel cables attached at the bottom of the door (figure I-4). Door counterbalance systems consist of either a single or multiple springs. Residential single-wide overhead door counterbalance systems rely on one spring while double-wide door counterbalance systems require two springs. Overhead door springs may also be nested inside of one another to

[39] Petitioners' customers for overhead door springs include original equipment manufacturers ("OEMs"), distributors, and garage-door dealers and installers. Conference transcript, pp. 46 (Boldenow), 47 (McAlear), 47–48 (Bianco).

provide greater force in certain overhead door counterbalance systems.[40] For two overhead door springs to be wound in the same direction (when lowering the door), they are installed as pairs with a right-hand winding on the left side and a left-hand winding on the right side of the door counterbalance lifting assembly (figure I-4).

Figure I-4
Overhead door springs: Components of an overhead door counterbalance lift system



Source: Petition, figure 4, p. 11.

[40] One or two springs are placed inside a spring to generate more torque to lift a heavier door or to where there is less "head" space above the door frame. Conference transcript, pp. 50–51 (Bianco). Moreover, counsel to petitioners argues that nested springs are within the same domestic like product, being produced on the same equipment, by the same producers, and sold the same types of customers for the same general purpose. Conference transcript, p. 51 (Cannon).

Five other types of springs are specifically excluded from the scope of these investigations:[41]

- **Leaf springs**— are arc-shaped, flat-rolled spring steel rather than wire and are commonly utilized in motor-vehicle suspension systems.
- **Disc springs**— are conically shaped, flat-rolled steel rather than wire and are used for vibration control, thermal expansion control, bolt relaxation (loss of prestress) and creep (deformation) control, and in certain automotive applications (e.g., clutches).
- **Compression springs**— are open wound rather than tightly wound wire, designed to compress under load rather than wound to store energy. They are utilized for resisting compression to control motion, measuring forces, storing energy (e.g., in watches and toys), controlling vibrations, and operating valves.
- **Extension springs**— have close helical windings like torsion springs but are not designed for winding and will deform or break when subjected to torque. Rather, extension springs store energy by being stretched and release it by contracting to their original shape.[42] While some overhead door lifting systems include extension springs, this is a very small and declining part of the market.[43]
- **Suspension springs**— are mounted alongside the door tracks rather than over the door and connect to the door lifting system with different mounting hardware.[44] Not being mounted on a pole, these springs are considered more dangerous when they break. They are currently used principally as replacements in existing extension spring systems, as garage door manufacturers have moved away from that lift design.

Finally, there are other uses for out-of-scope torsion springs in mechanical applications such as machinery, hinges, toys, mousetraps, and clothespins.[45] However, these are not in the size range and wire gauges of the subject overhead door springs and have a wide variety of shapes and arms on their ends. Releasing the torque of such springs moves the arm on the end as a lever.[46]

[41] Petitioners' postconference brief, pp. 5–6.
[42] Conference transcript, p. 76 (Bianco).
[43] Producer questionnaire responses at III-4.
[44] Conference transcript, p. 72 (Bianco).
[45] Conference transcript, p. 76 (Cannon).
[46] Petitioners' postconference brief, pp. 6–7.

Manufacturing processes[47]

At the Commission's staff conference, petitioners' witnesses testified that both domestic and subject producers rely on the same processes and equipment to manufacture overhead door springs.[48] They also testified that the production equipment is specifically designed for overhead door springs and is not suitable for producing other types of springs.[49]

The manufacturing process for overhead door springs consists of four successive processing stages: (1) wire winding, (2) heat treating, (3) coating and finishing, and (4) fabricating.

Wire winding— Steel wire (typically, high-carbon steel wire containing 0.55 percent or more carbon) is fed into machines that straighten, coil, and form it into a helical shape with a specific inside diameter. Spring coiling is accomplished on a spring coiler machine that conveys the wire onto rollers and coils the wire backwards to form a spring. Spring forming is accomplished on a spring former machine that shapes the spring with various types of bends, hoops, and radii. The spring coiling and forming processes, whether operator guided or

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[47] Unless otherwise noted, this information is based on the petition, pp. 12–13.

[48] Conference transcript, p. 17 (McAlear), p. 27 (Johnson).

[49] All three domestic producers provide both tension springs and other types of springs for overhead door lifting systems. IDC Spring and Iowa Spring also provide other types of springs other industry sectors. IDC Spring, "Your Source for Garage Door and Mechanical Springs" webpage, ©2024, https://idcspring.com, accessed December 3, 2024; Iowa Spring, "We are Iowa Spring: Mechanical, Agricultural and Overhead Garage Door Springs" webpage, no date, https://www.iowaspring.com, accessed December 3, 2024; Service Spring, "Experience the SSC Difference Your Trusted Provider of American-Made and Locally-Sourced Garage Door Springs" webpage, ©2023, https://www.servicespring.com, accessed December 3, 2024.

None of the petitioning domestic producers utilize the same equipment to manufacture both overhead door springs and other types of springs. At Iowa Spring, other spring types are produced not only on separate equipment but also in a separate facility from that for overhead door springs. Conference transcript, p. 74 (Boldenow and Bianco).

According to counsel to petitioners, two of the other domestic producers are small firms that are believed to be producing only in-scope springs. Overhead Door Corporation produces in-scope springs *** for manufacturing residential and commercial garage doors. ***. Its TorqueMaster® Plus garage door counterbalance system includes the torsion springs encased within steel tubes as a safety measure. Conference transcript, p. 49 (Cannon); petitioners' postconference brief, exh. 1: Responses to Staff Questions, p. 7; Wayne Dalton, "About," ©2024, https://www.wayne-dalton.com/about, accessed December 5, 2024; Wayne Dalton, "TorqueMaster® Counterbalance," ©2024, https://www.wayne-dalton.com/about/torque-master-counterbalance, accessed December 5, 2024; and USITC staff correspondence with Overhead Door Corp., December 5, 2024).

computer numeric controlled ("CNC"), can be used either individually or in combination, depending on the spring specification.

Heat treating— The spring is heat treated in a conveyor belt oven. The time and temperature at which the spring is heat treated depends on the type and amount of the component wire and the manufacturing process for the spring. Heat treating can also include additional steps or be repeated, depending on the material and its processing. After heat treating is completed, the spring is cooled and prepared for the subsequent manufacturing steps. The wire chemistry and heat treatment provide the tensile strength for the spring to perform many repeated coiling and uncoiling cycles over the course of its service life.

Coating and finishing— Springs may be surface finished, plated or coated to further strengthen; improve fatigue resistance; and enhance resistance to chipping, scratching, fading, and corrosion. All petitioning domestic producers claim the ability to perform these operations within their respective facilities,[50] but some also outsource certain specific processes[51] due to capacity constraints.[52] Purchaser *** and subject foreign producer *** claimed that certain shot-peened and powder-coated springs were not available from domestic suppliers.[53] Conversely, the petitioners assert they have the ability to supply overhead door springs in all the sizes, types, and finishes available from the subject sources.[54]

Fabricating— After the spring is cut to the desired length, mounting cones can be installed on the opposite ends.[55] Springs are often stenciled and color coded for common coil diameters by being fed through a striping machine that sprays colored paint in a line along the longitudinal length of the helix. The finished springs are packaged and stacked on pallets for

[50] Conference transcript, pp. 43 (Boldenow), 45 (Walkup), 45–46 (Cannon).

[51] IDC Spring applies the basic black painting within its own facilities but outsources powder coating and e-coating. Conference transcript, p. 65 (Boldenow).

[52] Service Spring performs coating and finishing operations both internally as well as outsourcing. Conference transcript, p. 65 (McAlear). Iowa Spring, which produces both overhead door springs and nonsubject springs for other applications, resorts to outsourcing when it reaches capacity constraints of its shot peening and powder coating lines. Conference transcript, p. 65 (Bianco).

[53] *** purchaser questionnaire response at I-2; *** foreign producer questionnaire response at II-11; *** postconference brief, pp. 2–3; exh. 1: Sworn Declaration of ***; exh. 3: Sworn Declaration of ***.

[54] Petitioners' postconference brief, pp. 12–13; exh. 4: Declaration of Jodi Boldenow, paras. 6–7; exh. 5: Declaration of Tim Bianco, para. 8; exh. 6: Declaration of Matthew McAlear, paras. 7, 11; conference transcript, p. 14 (Boldenow).

[55] Domestic producers of overhead door springs purchase the cones from aluminum casters. Conference transcript, p. 19 (McAlear).

shipping. Springs may be packaged separately or in pairs. When springs are packaged in pairs, the set typically consist of one right-hand wind and one left-hand wind spring. Springs may also be packaged with other parts of a spring counterweight assembly for an overhead door, with door mounting hardware kits or with garage door kits.[56]

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. Petitioners propose that the Commission define a single domestic like product coextensive with the scope.[57] No respondent party objects to the proposed definition of the domestic like product for purposes of these preliminary phase investigations.

[56] Witnesses for two of the petitioning domestic producers testified that their firms do not sell overhead door springs with other components as a kit for overhead door counterbalance systems. Conference transcript, p. 74 (Boldenow and McAlear).

[57] Petitioners' postconference brief, pp. 3-4.

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

U.S. market characteristics

Overhead door springs are used in door counterbalance systems. A door counterbalance system is a mechanism using opposing forces or weights to ease in the raising and lowering of overhead gates or doors, including garage doors, industrial rolling doors, warehouse doors, truck and trailer doors, storage doors, security gates for retail storefronts, and other overhead doors and gates.[1] Typically, residential single-wide overhead door counterbalance systems have one spring while double-wide door systems have two springs. The springs are used in door counterbalance systems that include, for example, high-lift and vertical-lift doors, transit and trucking doors, rolling steel garage doors, heavy-duty overhead doors at industrial loading docks, commercial and residential garage doors, and sectional and one-piece garage doors. A single door counterbalance system may include multiple springs.[2] The average cycle life of an overhead door spring is 10,000 cycles and the spring itself should last about seven years.[3] Different finishings, such as shot peening, can increase the cycle life of overhead door springs by 50 percent, or up to 15,000 cycles.[4] Demand for overhead door springs is tied to new residential and commercial construction, as well as renovation/replacement demand.[5] The size of the overhead door spring used in a particular application is based on the weight of the door being lifted.[6] Generally, this is calculated by an "inch pounds per turn" formula, meaning each inch turned on that revolution of the spring will lift a certain amount of weight, and uses the wire diameter, the outer and inner diameter, and the length of the spring, as well as the weight of the door, to determine the inch pounds per turn.[7]

All four U.S. producers[8] and nine of twelve responding importers reported that there were no changes in the product mix or marketing of overhead door springs since January 1, 2021. Importer *** reported that the product trended to kits versus individual

[1] Petition, p. 10.

[2] Petition, pp. 11-12.

[3] Conference transcript, pp. 55-56 (McAlear).

[4] Conference transcript, pp. 88-89 (McAlear).

[5] Conference transcript, p. 56 (Boldenow, McAlear). IDC Spring stated that its business is primarily tied to new construction while Service Spring stated that its business is tied more of the replacement market.

[6] Conference transcript, p. 58 (McAlear).

[7] Conference transcript, p. 53 (Bianco).

[8] Overhead Door Corporation did not provide a completed or partial U.S. producer questionnaire in time to be incorporated into the staff report.

components and importer *** reported more pallet-quantity shipping direct to contractors instead of picking up for wholesale distributors. Petitioners stated that their customer mix and ultimately product mix has been consistent year-over-year, over many years.[9]

Two of four U.S. producers and three of twelve importers indicated that the market was subject to distinctive conditions of competition. Specifically, *** reported that it is a very cost-competitive industry, and customers will follow the lowest price available in the market. Importer *** reported that there has been more competition from companies importing from China and India, which drives the prices down and erodes margins significantly.

Apparent U.S. consumption of overhead door springs fluctuated during 2021-23, increasing in 2022 and decreasing in 2023. Overall, apparent U.S. consumption in 2023 was lower than in 2021. During January-June 2024, however, apparent U.S. consumption was higher than during January-June 2023.

Channels of distribution

U.S. producers sold approximately four-fifths of their U.S.-produced overhead door springs to end users. U.S. importers sold mainly to end users as well, with the exception of 2023 when they sold mostly to distributors, as shown in table II-1.

Table II-1
Overhead door springs: 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	Distributor	***	***	***	***	***
United States	End user	***	***	***	***	***
China	Distributor	***	***	***	***	***
China	End user	***	***	***	***	***
India	Distributor	***	***	***	***	***
India	End user	***	***	***	***	***
Subject sources	Distributor	***	***	***	***	***
Subject sources	End user	***	***	***	***	***
Nonsubject sources	Distributor	---	---	---	---	---
Nonsubject sources	End user	---	---	---	---	---
All import sources	Distributor	***	***	***	***	***
All import sources	End user	***	***	***	***	***

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

[9] Conference transcript, pp. 59-60 (Boldenow, McAlear, and Bianco).

Geographic distribution

U.S. producers reported selling overhead door springs to all U.S. regions (table II-2). Importers reported selling overhead door springs imported from China to all regions except the Northeast while importers reported selling overhead door springs imported from India to the Midwest, Southeast, and Central Southwest. U.S. producers sold more than 90 percent of their overhead door springs within 1000 miles of their production facility, and less than 10 percent were over 1,000 miles. Importers sold approximately two-thirds of their imported overhead door springs within 100 miles of their U.S. point of shipment, less than 30 percent between 101 and 1,000 miles, and less than ten percent over 1,000 miles.

Table II-2
Overhead door springs: Count of U.S. producers' and U.S. importers' geographic markets

Region	U.S. producers	China	India	Subject sources
Northeast	4	0	0	0
Midwest	4	2	1	3
Southeast	4	2	1	3
Central Southwest	4	2	1	3
Mountain	4	2	0	2
Pacific Coast	4	4	0	4
Other	4	1	0	1
All regions (except Other)	4	0	0	0
Reporting firms	4	6	1	7

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 overhead door springs from U.S. producers and from subject countries.

Table II-3
Overhead door springs: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in 1,000 pounds; ratio and share in percent

Factor	Measure	United States	China	India	Subject suppliers
Capacity 2021	Quantity	***	***	***	***
Capacity 2023	Quantity	***	***	***	***
Capacity utilization 2021	Ratio	***	***	***	***
Capacity utilization 2023	Ratio	***	***	***	***
Inventories to total shipments 2021	Ratio	***	***	***	***
Inventories to total shipments 2023	Ratio	***	***	***	***
Home market shipments 2023	Share	***	***	***	***
Non-US export market shipments 2023	Share	***	***	***	***
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 a large majority of U.S. production of overhead door springs in 2023. Responding foreign producer/exporter firms accounted for *** percent of U.S. imports of overhead door springs from China and *** of U.S. imports from India during 2023. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, “Summary Data and Data Sources.”

Domestic production

Based on available information, U.S. producers of overhead door springs have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced overhead door springs to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity. Factors mitigating responsiveness of supply include some availability of inventories, limited ability to shift shipments from alternate markets, and no ability to shift production to or from alternate products.

Subject imports from China

Based on available information, the sole responding producer of overhead door springs from China, MFG Direct (Ningbo), has the ability to respond to changes in demand with *** changes in the quantity of shipments of overhead door springs to the U.S. market. The main contributing factors to this degree of responsiveness of supply are *** unused capacity, *** inventories, and *** ability to shift production to or from alternate products, though there is *** availability to shift shipments from alternate markets. However, MFG Direct (Ningbo) represents a small portion of the overhead door springs imported from China during the period for which data were collected.

Subject imports from India

Based on available information, the sole responding producer of overhead door springs from India, Alcomex, has the ability to respond to changes in demand with moderate changes in the quantity of shipments of overhead door springs to the U.S. market. The main contributing factors to this degree of responsiveness of supply is the ability to shift shipments from alternate markets. Factors mitigating responsiveness of supply include limited availability of unused capacity and inventories, and no ability to shift production to or from alternate products. Respondent Alcomex stated that it *** and the terms ***.[10]

Imports from nonsubject sources

There were no known imports for overhead door springs from nonsubject sources since January 1, 2021.

Supply constraints

Most U.S. producers and importers reported that they had experienced supply constraints in 2021 and 2022, while most firms reported that they had not experienced supply constraints in 2023 and 2024 (table II-4). U.S. producers reported shortages of wire material in 2021 and the first half of 2022,[11] which led to customers of all four U.S. producers being put on allocation or declined orders. U.S. producer *** also stated that imports from China

[10] Respondent Alcomex's postconference brief, p. 8, and Exhibit 1, Attachment A.
[11] See also Conference transcript, pp. 11-12 (Boldenow).

and India “surged” into the market during the COVID-19 pandemic and continued to increase in 2022, 2023 and 2024, displacing sales despite no allocations or capacity limitations. Importers also reported supply chain failures and raw material shortages during the COVID-19 pandemic. Importers *** reported that U.S. producers could not meet demand in 2021, so the importers looked elsewhere for sourcing. Importers *** reported that {domestic} manufacturers reduced availability and raised prices extremely high. Importer *** reported controlled order entry, declining to accept new customers or to renew existing customers, delivering less than quantity promised, and being unable to meet timely shipment commitments in 2021 and 2022, but that the supply chain disruption has resolved since 2023.

Table II-4
Overhead door springs: Count of firms’ responses reporting supply constraints, by firm type and period

Firm type	2021	2022	2023	2024 to present
U.S. producers	4 of 4	3 of 4	0 of 4	0 of 4
Importers	7 of 11	6 of 12	2 of 11	1 of 12

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

U.S. demand

Based on available information, the overall demand for overhead door springs 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 overhead door springs in most of its end-use products.

End uses and cost share

Overhead door springs are used in door counterbalance systems, such as garage doors, industrial rolling doors, warehouse doors, truck and trailer doors, storage doors, security gates for retail storefronts, and other overhead doors and gates.[12] U.S. demand for overhead door springs depends on the demand for U.S.-produced downstream products. Overhead door springs account for a small-to-moderate share of the cost of the end-use products in which they are used. Reported end uses and cost shares were garage door units (residential and commercial, 4 to 11 percent share); trailer, truck, storage, and transportation doors (3 to 50 percent); mini roll-up door (5.5 percent); and spring replacement (87 percent).

[12] Petition, p. 10.

Business cycles

Three of four U.S. producers and nine of twelve importers indicated that the market was subject to business cycles. Generally, the overhead door spring market follows new construction trends in both commercial and residential construction as well as remodeling industry trends. Firms reported seasonal variations in demand, with higher demand in the second and third quarters of the year and lower demand in the first and fourth quarters. Importer *** reported that in a typical year, January-June is its peak season then slowly ramps down until December.

Demand trends

All responding U.S. producers reported that U.S. demand for overhead door springs fluctuated down since January 1, 2021 (table II-5). A majority of responding importers (8 firms) reported that U.S. demand increased (either steadily or fluctuated up) although four reported that demand decreased. U.S. producers stated that demand was still high in 2021 and 2022 due to the COVID-19 pandemic and declined (or "normalized") in 2023 and 2024. Importer *** reported that market demand is trending down because garage door sets are tied to housing and high interest rates have slowed demand for garage door set products, including overhead door springs. Importer *** reported that demand went up during the COVID-19 pandemic as U.S. supply was limited, and demand has decreased somewhat from the high during the pandemic.

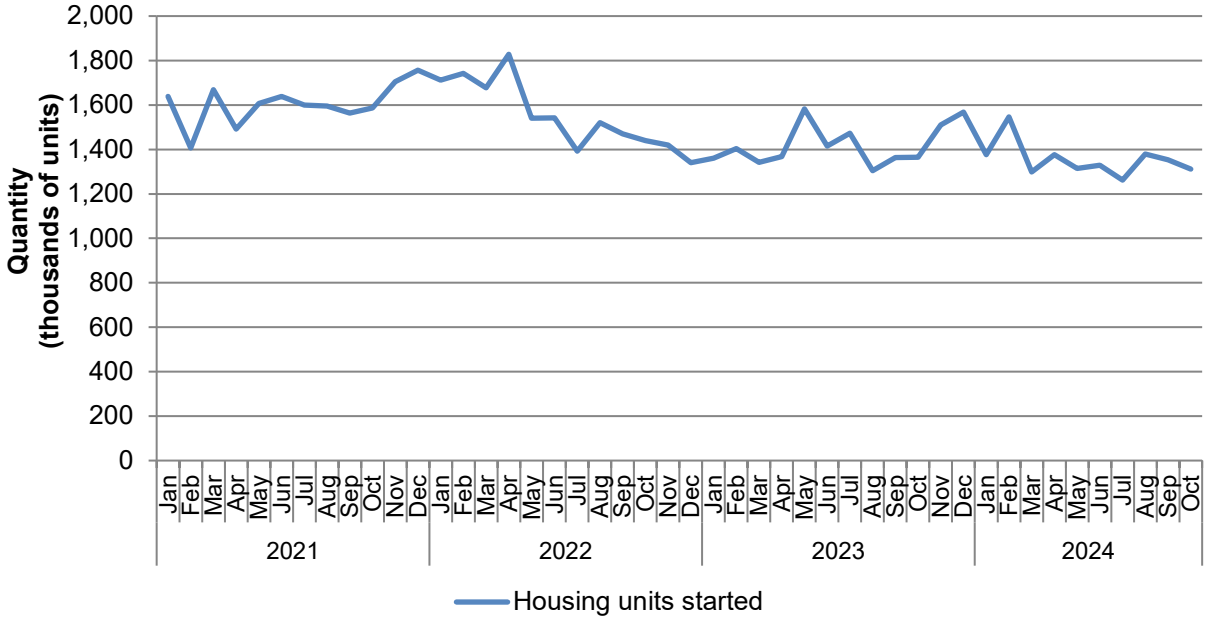
Table II-5
Overhead door springs: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Market	Firm type	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease
Domestic demand	U.S. producers	0	0	0	4	0
Domestic demand	Importers	3	5	0	3	1
Foreign demand	U.S. producers	0	0	0	2	0
Foreign demand	Importers	1	1	0	2	1

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

As shown in figure II-1 and table II-6, seasonally adjusted U.S. housing units started fluctuated from January 2021 to October 2024, reaching a period high in April 2022 but declining thereafter. Housing starts declined by approximately 19 percent between January 2021 and June 2024, with a slight further decline from June to October 2024.

Figure II-1
U.S. housing starts: Total new privately-owned housing units started, monthly, seasonally adjusted at annual rates, January 2021-October 2024



Source: U.S. Census Bureau and U.S. Department of Housing and Urban Development, New Privately-Owned Housing Units Started: Total Units HOUST), retrieved from FRED, Federal Reserve Bank of St. Louis, available at https://fred.stlouisfed.org/series/ALTSALES, retrieved November 19, 2024.

Table II-6
U.S. housing starts: Total new privately-owned housing units started, monthly, seasonally adjusted at annual rates, January 2021-October 2024

Quantity in thousands of housing units

Month	2021	2022	2023	2024
January	1,639	1,712	1,361	1,376
February	1,407	1,742	1,404	1,546
March	1,668	1,678	1,342	1,299
April	1,492	1,828	1,368	1,377
May	1,607	1,540	1,583	1,315
June	1,638	1,542	1,415	1,329
July	1,600	1,392	1,473	1,262
August	1,595	1,520	1,305	1,379
September	1,563	1,470	1,363	1,353
October	1,587	1,440	1,365	1,311
November	1,704	1,420	1,510	NA
December	1,757	1,340	1,568	NA

Source: U.S. Bureau of Economic Analysis, New Privately-Owned Housing Units Started: Total Units (HOUST), retrieved from FRED, Federal Reserve Bank of St. Louis, available at https://fred.stlouisfed.org/series/ALTSALES, retrieved November 19, 2024.

Substitute products

All responding U.S. producers and importers reported that there were no substitutes for overhead door springs. Petitioner Service Spring stated that the industry is standardized on torsion springs and the only reason a customer may use and extension spring is if the customer's prior door setup is already an extension spring setup.[13]

Substitutability issues

This section assesses the degree to which U.S.-produced overhead door springs and imports of overhead door springs from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of overhead door springs from domestic and imported sources based on those factors. Based on available data, staff believes that there is a high degree of substitutability between domestically produced overhead door springs and overhead door springs imported from subject sources.[14] Factors contributing to this level of substitutability include interchangeability between domestic and subject sources, and limited significant factors other than price.

Factors affecting purchasing decisions

Purchasers responding to lost sales lost revenue allegations[15] were asked to identify the main purchasing factors their firm considered in their purchasing decisions for overhead door springs. The most often cited top three factors firms consider in their purchasing decisions for overhead door springs were quality and price (6 firms each), and lead times (2 firms) as shown in table II-7. Quality was the most frequently cited first-most important factor (cited by 4 firms), followed by price (2 firms); quality and price were the most frequently reported second-most important factors (2 firms each); and price and lead times were the most frequently reported third-most important factors (2 firms each).

[13] Conference transcript, pp. 99-100 (McAlear).

[14] The degree of substitution between domestic and imported overhead door springs depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced overhead door springs to the overhead door springs imported from subject countries (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.).

[15] This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part V for additional information.

Table II-7
Overhead door springs: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Factor	First	Second	Third	Total
Quality	4	2	0	6
Price	2	2	2	6
Lead times	0	0	2	2
Location	1	0	0	1
All other factors	0	2	2	4

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

Note: Other factors include location, packaging, life cycle/performance, availability, and product grading to enable different price bands.

Lead times

Domestically produced overhead door springs are primarily produced-to-order while overhead door springs imported from China and India are mostly sold from U.S. inventories. U.S. producers reported that nearly 80 percent of their commercial shipments were produced-to-order in 2023, with lead times averaging approximately one week. The remaining commercial shipments came from inventories, with lead times averaging 1-2 days. Petitioners Iowa Spring and IDC Spring stated that they produce everything to order, and Petitioner Service Spring is majority made to order, but they have distribution centers across the U.S., so it stocks distribution centers.[16] All three petitioners stated that they produce on demand, just-in-time, with lead times in 24-48 hours and most within five days.[17]

Importers reported that more than 95 percent of their commercial shipments were sold from U.S. inventories in 2023, with lead times averaging 5-6 days. The remaining *** to ensure that it is able to provide needed product within the *** period.[18]

[16] Conference transcript, p. 66 (Bianco, Boldenow, and McAlear), pp. 84-85 (Boldenow, Bianco, Cannon).

[17] Conference transcript, p. 67 (Boldenow).

[18] Respondent Alcomex's postconference brief, p. 3.

Comparison of U.S.-produced and imported overhead door springs

In order to determine whether U.S.-produced overhead door springs can generally be used in the same applications as imports from China and India, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-8, all U.S. producers and nearly all importers reported that domestically produced overhead door springs and overhead door springs imported from China and India are always or frequently interchangeable.

Table II-8
Overhead door springs: Count of U.S. producers and importers 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. China	U.S. producers	3	1	0	0
U.S. vs. India	U.S. producers	3	1	0	0
U.S. vs. other	U.S. producers	3	0	0	0
China vs. India	U.S. producers	3	0	0	0
China vs. Other	U.S. producers	3	0	0	0
India vs. Other	U.S. producers	3	0	0	0
U.S. vs. China	Importers	5	5	1	0
U.S. vs. India	Importers	2	3	0	0
U.S. vs. other	Importers	1	0	0	0
China vs. India	Importers	0	0	0	0
China vs. Other	Importers	0	0	0	0
India vs. Other	Importers	0	0	0	0

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of overhead door springs from the United States, subject, or nonsubject countries. As seen in table II-9, all U.S. producers and most importers reported that there are sometimes or never significant differences other than price between domestically produced overhead door springs and overhead door springs imported from China and India. Importer *** reported that differentiating and innovative features, such as shot-peened and powder coated springs for high cycle use, are significant differences between domestically produced overhead door springs and overhead door springs imported from India. Importer *** reported that customers prefer Indian or domestic springs because Chinese springs are typically lower quality.

Table II-9
Overhead door springs: Count of U.S. producers and importers reporting the significance of differences other than price 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. China	U.S. producers	0	0	0	4
U.S. vs. India	U.S. producers	0	0	0	4
U.S. vs. other	U.S. producers	0	0	0	3
China vs. India	U.S. producers	0	0	0	3
China vs. Other	U.S. producers	0	0	0	3
India vs. Other	U.S. producers	0	0	0	3
U.S. vs. China	Importers	0	2	5	3
U.S. vs. India	Importers	0	2	2	1
U.S. vs. other	Importers	0	0	1	0
China vs. India	Importers	0	0	0	0
China vs. Other	Importers	0	0	0	0
India vs. Other	Importers	0	0	0	0

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

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

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

U.S. producers

The Commission issued U.S. producer questionnaires to eight firms based on information contained in the petition and publicly available sources. Four firms provided usable data on their operations.[1] Table III-1 lists U.S. producers of overhead door springs, their production locations, positions on the petition, and shares of total production.

[1] Petitioners IDC Spring, Iowa Spring, and Service Spring provided completed U.S. producer questionnaire responses, as did Napoleon Spring, albeit with issues in its financial data that it was unable to address. Penn Central Spring – Alto Door Holdings ("Penn Central Spring") submitted an incomplete U.S. producer questionnaire response for its *** pounds of overhead door springs in 2023 (equivalent to less than *** percent of domestic production in that year). Overhead Door Corporation, which submitted a complete U.S. importer questionnaire response, did not provide a completed or partial U.S. producer questionnaire in time to be incorporated into the staff report, and did not comply with staff's requests to provide partial 2023 production data prior to submission of the completed questionnaire. Dura-Lift Hardware, a subsidiary of Norstar International, indicated in email correspondence with Commission staff that it has *** domestic production facilities for "torsion springs for overhead door companies," and provided an estimate of 2023 production (*** pounds), but despite efforts by staff did not submit a U.S. producer questionnaire response in these preliminary phase investigations. American Spring, Inc., a firm identified in the petition as a possible U.S. producer, did not respond to requests from staff for a U.S. producer questionnaire. See U.S. producer questionnaire responses generally, as well as email from ***, November 26, 2024; USITC staff email correspondence with Overhead Door Corporation, EDIS Docs. 837709, 837710, and 838688; and email from ***, December 1, 2024.

Table III-1
Overhead door springs: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2023

Firm	Position on petition	Production locations	Share of production
IDC Spring	Petitioner	Coon Rapids, MN Piqua, OH Mesa, AZ	***
Iowa Spring	Petitioner	Adel, IA Granite Quarry, NC	***
Napoleon Spring	***	Archbold, OH Phoenix, Arizona Mississauga, Canada St. Lambert, Quebec, Canada	***
Service Spring	Petitioner	Maumee, OH Visalia, CA	***
All firms	Various	Various	100.0

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

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

Table III-2
Overhead door springs: 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, *** of the responding U.S. producers are related to foreign producers of overhead door springs from China or India and *** of the responding U.S. producers are related to U.S. importers of overhead door springs from China or India. In addition, as discussed in greater detail below, *** directly imports the subject merchandise as does ***. None of the responding U.S. producers reported purchasing overhead door springs from China or India from U.S. importers.

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

Table III-3
Overhead door springs: Important industry events since 2021

Item	Firm	Event
New facility	Iowa Spring	November 2021— Iowa Spring commenced construction on a second production facility in Ames, Iowa. Capital investment expenditures include $7.4 million for the facility and $3 million to $5 million for equipment. Employment plans include transferring 20 current employees from the existing Ames facility along with hiring 20 additional employees for the new facility.
Capital investment cutbacks	IDC Spring	2023–24— IDC Spring scaled-back its planned capital investments.
Workforce reduction	Service Spring	2023–24— Service Spring relied on attrition rather than lay-offs to reduce its workforce as sales subsided, after previously expanded hiring to meet surges during 2021–22.
New facility	Iowa Spring	April 2023— Iowa Spring expanded its corporate production capacity by opening a second facility located near its original facility, in Ames, Iowa.
Acquisition	Iowa Spring	September 2023— Iowa Spring completed its acquisition of Northeast Spring Inc. an overhead door spring manufacturer with facilities in Reading, Pennsylvania, and Villa Rica, Georgia. Northeast Spring will retain its corporate name and management team during a three-year transition period.
Lay-offs	Iowa Spring	First–third quarters 2024— Iowa Spring reduced its workforce, curtailed the number of production shifts available, and continued to operate at a low-capacity utilization rate.
Lay-offs	IDC Spring	November 2024— IDC Spring eliminated 23 positions at its facility in Piqua, Ohio.

Source: Allison Ullmann, "Iowa Spring Manufacturing Breaks Ground on $7.4M Expansion in Adel," Des Moines Register, December 19, 2021, https://www.desmoinesregister.com/story/news/2021/12/19/iowa-spring-manufacturing-breaks-ground-7-4-m-expansion-adel/8668203002/#:~:text=in%20Adel%20and%20the%20new,and%205%2C000%20for%20office%20space; Allison Ullmann, "Iowa Spring Celebrates Recent Expansion with Ribbon Cutting, Open House," Des Moines Register, April 27, 2023, https://www.desmoinesregister.com/story/news/local/dallas-county/2023/04/27/iowa-spring-manufacturing-celebrates-recent-expansion-with-ribbon-cutting-open-house-in-adel/70150318007; PN Newswire, "Iowa Spring Expands Manufacturing Capability Through Acquisition of Northeast Spring," September 18, 2023, https://www.prnewswire.com/news-releases/iowa-spring-expands-manufacturing-capability-through-acquisition-of-northeast-spring-301929658.html; Petition, p. 32, exh. 12; Petitioners' postconference brief, pp. 38–39, exh. 4: Declaration of Jodi Boldenow, para. 10; conference transcript, pp. 15 (Boldenow), 26 (Bianco), 86 (McAlear).

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of overhead door springs since 2021. All four responding U.S. producers indicated in their questionnaires that they had experienced such changes. Table III-4 presents the changes identified by these producers.

Table III-4
Overhead door springs: U.S. producers' reported changes in operations, since January 1, 2021

Item	Firm name and narrative response on changes in operations
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***
Weather-related or force majeure events	***
Other	***

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

U.S. production, capacity, and capacity utilization

Table III-5 presents U.S. producers' installed and practical capacity and production on the equipment used to produce overhead door springs. None of the responding U.S. producers reported production of other products on the same equipment.

Installed overall capacity steadily increased from 2021 to 2023 by *** percent. Three of the four responding U.S. producers reported increases in installed overall capacity between 2021 and 2023, the largest of which, both in absolute quantity and relative to 2021, was the *** percent increase reported by ***. Practical capacity peaked in 2022 prior to a *** percent decline from 2022 to 2023, for a net increase of *** percent during 2021-23. Production initially increased from 2021 to 2022 by *** percent, then decreased from 2022 to 2023 for a net decline of *** percent. Capacity utilization, whether measured by installed capacity or practical capacity, decreased in both 2022 and 2023. In contrast, installed capacity, practical capacity, production, and capacity utilization were little changed in January-June 2024 relative to January-June 2023.

Table III-5
Overhead door springs: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

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

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical overhead door springs	Capacity	***	***	***	***	***
Practical overhead door springs	Production	***	***	***	***	***
Practical overhead door springs	Utilization	***	***	***	***	***

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

Table III-6 presents U.S. producers' reported narratives regarding practical capacity constraints. *** responding U.S. producers reported production constraints for the production of overhead door springs.

Table III-6
Overhead door springs: U.S. producers' reported capacity constraints since January 1, 2021

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

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

Table III-7 and figure III-1 present U.S. producers' production, capacity, and capacity utilization.

Table III-7
Overhead door springs: U.S. producers' output, by firm and period

Practical capacity

Capacity in 1,000 pounds

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-7 Continued
Overhead door springs: U.S. producers' output, by firm and period

Production

Production in 1,000 pounds

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table III-7 Continued
Overhead door springs: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity.

Table continued.

Table III-7 Continued
Overhead door springs: U.S. producers' output, by firm and period

Share of production

Shares in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Napoleon Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Figure III-1
Overhead door springs: 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 increased by *** percent during 2021-22 and decreased by *** percent during 2022-23, for a net increase of *** percent. Practical overhead door springs capacity was *** percent lower in January-June 2024 compared to January-June 2023. With the exception of ***, all firms reported net increases in overhead door springs capacity from 2021 to 2023. *** reported the largest 2021-23 increase in overhead door springs capacity, an increase of *** percent, which accounted for

*** of the overall increase in U.S. producers' overhead door springs capacity over that period.[2] *** accounted for the entire decline in capacity from 2022 to 2023.[3]

U.S. producers' production decreased overall by *** percent from 2021 to 2023, despite an initial increase of *** percent from 2021 to 2022. *** reported net declines from 2021 to 2023. Responding U.S. producers' U.S. production was *** percent higher in January-June 2024 relative to January-June 2023, as the largest U.S. producer in all periods (***) reported *** percent lower production volumes in the second of the two interim periods, while *** reported January-June 2024 production levels *** percent higher than in January-June 2023. U.S. producers' shares of overhead door springs production remained relatively stable across the periods reported.

Capacity utilization declined by *** percentage points from 2021 to 2023, as the responding U.S. producers experienced net declines. U.S. producers' overall capacity utilization was *** percentage points higher in January-June 2024 than in January-June 2023, as only *** reported a January-June 2024 capacity utilization rate lower than in January-June 2023.

Alternative products

No responding U.S. producer reported production of other products on the same equipment used to produce overhead door springs during the period for which data were collected.[4]

[2] In 2023, following the COVID-19 pandemic, IDC Spring expanded employment to increase production of overhead door springs. Conference transcript, pp. 14-15 (Boldenow).

[3] ***. ***'s U.S. producer questionnaire response, section II-2a.

[4] Although *** reported production of alternative products on the same equipment and machinery as overhead door springs, *** reported production of extension springs. U.S. producer questionnaire, section III-4. Petitioners note that while a "very small" portion of garage doors are designed for use with extension springs (as opposed to in-scope torsion springs), this is a "tiny and declining portion of the market." Petitioners' postconference brief, p. 6

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

Table III-8 presents U.S. producers' U.S. shipments, export shipments, and total shipments.[5]

Table III-8
Overhead door springs: U.S. producers' total shipments, by destination and period

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

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
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.

U.S. shipments by quantity decreased overall by *** percent from 2021 to 2023, while the value of U.S. shipments increased overall by *** percent over the same period, after initial increases in both measures from 2021 to 2022. The quantity of U.S. shipments first rose by *** percent during 2021-22, and declined by *** percent during 2022-23. The value of U.S. shipments increased by *** percent from 2021 to 2022, then decreased by *** percent from 2022 to 2023. Average unit values ("AUV") increased by *** percent over the same period, peaking in 2022. *** reported net decreases in the quantity of U.S. shipments from 2021 to 2023, with the largest decline by quantity reported by ***,

[5] Responding U.S. producers ***. Overhead Door Corporation, which ***, did not provide a completed or partial U.S. producer questionnaire in time to be incorporated into the staff report, and did not comply with staff's requests to provide partial 2023 production data prior to submission of the completed questionnaire. Email from ***, December 5, 2024.

which reported a steady decline of *** percent from 2021 to 2023.[6] In terms of value, *** reported an initial 2021-22 increase in the value of U.S. shipments, as *** reported the largest 2021-22 increase in the value of U.S. shipments, a *** percent increase of *** pounds. The *** 2021-23 increase in the value of U.S. shipments was accounted for by ***, however, as *** reported 2021-23 net decreases.[7] In January-June 2024, U.S. producers' U.S. shipments were *** percent higher than in January-June 2023 in terms of quantity and *** percent lower in terms of value, resulting in AUVs in January-June 2024 *** percent lower compared to January-June 2023.

U.S. shipments never accounted for less than *** percent of total shipments by quantity and value. *** reported exports of overhead door springs, and the quantity of exports followed a similar trajectory to U.S. shipments from 2021 to 2023, declining by *** percent from 2021 to 2023 after peaking in 2022. The value of export shipments also declined by *** percent over the same period, after peaking in 2022.[8] As with U.S. shipments, the AUV of export shipments peaked in 2022 and decreased in 2023 for a net increase of *** percent. The AUV of export shipments was *** percent lower in January-June 2024 than in January-June 2023.

Total shipments in terms of both quantity and value peaked in 2022, and declined by *** percent during 2021-23, by quantity, and increased by *** percent in terms of value. The AUV increased by *** percent over the 2021-23 period, as well. The quantity of total shipments was *** percent higher in January-June 2024 relative to January-June 2023, and the value and AUV of total shipments were all lower in in January-June 2024 relative to January-June 2023.

[6] Although *** reported the largest 2021-23 relative decline in the quantity of U.S. shipments, the largest 2021-23 decrease in absolute terms was reported by ***, which reported a decline in U.S. shipments of *** from 2021 to 2023.

[7] *** reported a *** percent increase in the value of U.S. shipments from 2021 to 2023, the largest of any firm. ***'s U.S. producer questionnaire, section II-8.

[8] ***. U.S. producer questionnaire, section II-8.

U.S. producers' inventories

Table III-9 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**.** U.S. producers' inventories of overhead door springs decreased from 2021 to 2023, for a net decrease of *** percent, and were *** percent lower in January-June 2024 than in January-June 2023. Inventories of overhead door springs as a ratio to U.S. production, U.S. shipments, and total shipments were highest in 2021, declined in 2022, and increased from 2022 to 2023 for net decreases from 2021 to 2023, and all reached their lowest levels (calculated on an annualized basis) in interim 2024.[9]

Table III-9
Overhead door springs: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 pounds; ratio in percent

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

U.S. producers' imports from subject sources

U.S. producers' imports of overhead door springs are presented in table III-10. ***.[10]

[9] Iowa Spring and IDC Spring produce all overhead door springs as made to order, whereas Service Spring produces a majority of overhead door springs as made to order, but also has a network of distribution centers across the United States which stock overhead door springs, as well. Conference transcript, p. 66 (Bianco, Boldenow, and McAlear).

[10] Although it did not submit a complete questionnaire response, Penn Central Spring did confirm that ***. Email from ***, November 26, 2024. Overhead Door Corporation, a U.S. producer which did not submit a U.S. producer questionnaire response in time to be incorporated into the staff report, ***. Overhead Door Corporation's U.S. importer questionnaire, sections II-5a and II-6a.

Table III-10
Overhead door springs: *'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 pounds; ratio in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from China 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-11
Overhead door springs: U.S. producers' reasons for importing

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

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

U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of overhead door springs during 2021-23 or in either interim period.

U.S. employment, wages, and productivity

Table III-12 presents U.S. producers' employment-related data.

Table III-12
Overhead door springs: U.S. producers' employment related information, by period

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid ($1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (pounds per hour)	***	***	***	***	***
Unit labor costs (dollars per pound)	***	***	***	***	***

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

The number of PRWs increased overall by *** percent from 2021 to 2023, increasing by *** percent during 2021-22 and subsequently declining by *** percent from 2022 to 2023. U.S. producers' PRWs were *** percent higher in January-June 2024 than in January-June 2023.[11] Total hours worked also peaked in 2022 and increased overall from 2021 to 2023. The increase in total hours worked outpaced the increase in PRWs, leading to a steady increase of *** percent in hours worked per PRW from 2021 to 2023, with total hours worked per PRW *** across the two interim periods.

Wages paid increased by *** percent from 2021 to 2023, peaking in 2022, and were *** percent higher in January-June 2024 compared to January-June 2023. Hourly wages increased by *** percent overall from 2021 to 2023 and were *** percent higher in January-June 2024 relative to January-June 2023. Productivity steadily declined from 2021 to 2023 and was *** percent higher in January-June 2024 relative to January-June 2023. As wages paid and hourly wages increased, and productivity decreased, unit labor costs steadily rose by *** percent from 2021 to 2023 were *** across the January-June interim periods.

[11] IDC Spring noted in conference testimony that it eliminated 23 positions at its Ohio production facility, citing the loss of a significant customer to imports from India. Conference testimony, pp.14-15 (Boldenow). Service Spring stated that it has had to lay off employees after 2022, when the effects of a 2021-22 demand spike subsided. Conference testimony, p. 26 (McAlear). Iowa Spring noted that ***. Iowa Spring's U.S. producer questionnaire, section II-2a.

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

U.S. importers

The Commission issued importer questionnaires to 186 potential importers of overhead door springs, as well as to all U.S. producers of overhead door springs.[1] Usable questionnaire responses were received from 15 companies, representing 6.5 percent of U.S. imports from China in 2023, based on information submitted in the petition, and *** percent of U.S. imports from India, in 2023 under HTS subheadings 7320.20.5025, 7320.20.5045, and 7320.205060, each of which cover a variety of products in addition to overhead door springs.[2] [3] Table IV-1 lists all responding U.S. importers of overhead door springs, their locations, and their shares of U.S. imports, in 2023.

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

[2] Due to the presence of out-of-scope merchandise in each of the three listed HTS subheadings, the most accurate estimate of total imports of overhead door springs from China available to staff at the time of this report is from information submitted as part of the petition. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparison of available import datasets for China in the preliminary phase of these investigations. The coverage estimate listed above based on official Commerce statistics and data received in response to Commission questionnaire for imports from India.

[3] Nineteen firms which has been identified as possible importers of overhead door springs submitted questionnaire responses indicating that they had not imported overhead door springs from any source since January 1, 2021.

Table IV-1
Overhead door springs: U.S. importers, their headquarters, and share of imports within each source, 2023

Share in percent

Firm	Headquarters	China	India	Subject sources	Nonsubject sources	All import sources
Afri-Imports	San Diego, CA	***	***	***	---	***
Alcomex	Pittston, OH	***	***	***	---	***
Anytime Garage Door	Henderson, NV	***	***	***	---	***
Apex	Littleton, CO	***	***	***	---	***
Barnes	Maumee, OH	***	***	***	---	***
Cynergy Cargo	Douglas, GA	***	***	***	---	***
Garage Door Parts	Gold River, CA	***	***	***	---	***
Installed Building Products	Columbus, OH	***	***	***	---	***
Jammy	Fort Worth, TX	***	***	***	---	***
MFG Direct	Corona, CA	***	***	***	---	***
Napoleon Spring	Archbold, OH	***	***	***	---	***
Overhead Door	Lewisville, TX	***	***	***	---	***
Raynor	Fitzgerald, GA	***	***	***	---	***
Roll-Up Door	Blackshear, GA	***	***	***	---	***
Spartan Spring	Suwanee, GA	***	***	***	---	***
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 overhead door springs from China and India and all other sources. U.S. imports, by quantity, increased by *** percent during 2021-22 and declined by *** percent during 2022-23, for a net increase of *** percent from 2021 to 2023. Total imports were *** percent higher in January-June 2024 than in January-June 2023.

The initial 2021-22 increase in the quantity of total imports reflects increases in imports from both China and India over the same period. In 2023, imports from China continued to increase, while imports from India declined in 2023, though nonetheless were higher than in 2021 when *** were reported. The higher quantity of subject imports in January-June 2024 reflected higher quantities of imports from both China and India, compared to January-June 2023.

Trends for value were similar to those for quantity, as the value of imports from China increased by nearly three-fold during 2021-23, and the value of imports from India peaked in 2022 and increased across 2021-23. The value of imports from China and India were higher in

January-June 2024 than in January-June 2023. The value of subject imports increased sharply during 2021-23 and was substantially higher in January-June 2024 relative to January-June 2023. Imports from China accounted for the majority of U.S. imports in all periods.

The average unit value ("AUV") of imports from China fluctuated but decreased by 12.8 percent from 2021 to 2023, while the AUV of imports from India rose by *** percent from 2022 to 2023, the only two years during 2021-23 when imports from India were reported. The AUV of imports from China was 21.9 percent higher in January-June 2024 relative to January-June 2023, and imports from India reached their highest AUV of any period reported in January-June 2024. The AUV of imports from China was consistently higher than that of imports from India.

As a ratio to U.S. production, imports from China increased by *** percentage points during 2021-23, and were *** percentage points higher in January-June 2024 than in January-June 2023. Imports from India increased from *** in 2021 to *** percent in 2023 and had a higher ratio in the second of the two interim periods, but never exceeded *** percent in any annual or partial period. The ratio of imports from all sources to U.S. production of overhead door springs rose by *** percentage points during 2021-23, and was *** percentage points higher in January-June 2024 than in January-June 2023.

Table IV-2
Overhead door springs: U.S. imports by source and period

Quantity in 1,000 pounds, value in 1,000 dollars; unit value in dollars per pound

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
China	Quantity	3,454	10,648	11,009	4,112	8,317
India	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	---	---	---	---	---
All import sources	Quantity	***	***	***	***	***
China	Value	5,076	12,504	14,107	5,306	13,078
India	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	---	---	---	---	---
All import sources	Value	***	***	***	***	***
China	Unit value	1.47	1.17	1.28	1.29	1.57
India	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	---	---	---	---	---
All import sources	Unit value	***	***	***	***	***

Table continued on next page.

Table IV-2 Continued
Overhead door springs: Share of U.S. imports by source and period

Share and ratio in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
China	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	---	---	---	---	---
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	---	---	---	---	---
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	---	---	---	---	---
All import sources	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires for sources other than China and from information submitted as part of the petition for China. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparison of available import datasets for China in the preliminary phase of these investigations.

Note: For imports from China, "Quantity" data reflect estimates of the volume of U.S. imports of overhead door springs included in the petition; "Unit value" data reflect average unit values for U.S. imports for consumption under HTS statistical reporting number 7320.20.5045; "Value" data reflect the product (i.e. multiplication) of "Quantity" and "Unit value" for each period. 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 “---“.

Figure IV-1
Overhead door springs: U.S. import quantities and average unit values, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires for sources other than China and from information submitted as part of the petition for China. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparison of available import datasets for China in the preliminary phase of these investigations.

Note: For imports from China, "Quantity" data reflect estimates of the volume of U.S. imports of overhead door springs included in the petition; "Unit value" data reflect average unit values for U.S. imports for consumption under HTS statistical reporting number 7320.20.5045; "Value" data reflect the product (i.e. multiplication) of "Quantity" and "Unit value" for each period.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.[4] 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

[4] 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)).

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.[5] Imports from China accounted for *** percent of total imports of overhead door springs by quantity between October 2023 and September 2024, and imports from India accounted for *** percent.

Table IV-3
Overhead door springs: U.S. imports in the twelve-month period preceding the filing of the petition, October 2023 through September 2024

Quantity in 1,000 pounds; share in percent

Source of imports	Quantity	Share of quantity
China	16,824	***
India	***	***
Subject sources	***	***
Nonsubject sources	---	---
All import sources	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires for sources other than China and from information submitted in the petition for imports from China. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparison of available import datasets for China in the preliminary phase of these investigations.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Cumulation considerations

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

[5] Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Fungibility

Table IV-4 and figure IV-2 present U.S. producers' and U.S. importers' U.S. shipments of overhead door springs by source and by spring length, for 2023. U.S. producers shipped overhead door springs ***, and importers shipped overhead door springs imported from both China and India ***. *** of U.S. shipments from all sources were ***. While overhead door springs longer than 80 inches accounted for *** of U.S. producers' U.S. shipments, they accounted for the *** among importers U.S. shipments.

Table IV-4
Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and by spring length, 2023

Quantity in 1,000 pounds

Source	≥5" and <40"	≥40" and <80"	≥80"	All lengths
U.S. producers	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	---	---	---	---
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-4 Continued
Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and by spring length, 2023

Shares across in percent

Source	≥5" and <40"	≥40" and <80"	≥80"	All lengths
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
India	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	---	---	---	---
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-4 Continued
Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and by spring length, 2023

Shares down in percent

Source	≥5" and <40"	≥40" and <80"	≥80"	All lengths
U.S. producers	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	---	---	---	---
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-2
Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and by spring length, 2023

* * * * *

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

Table IV-5 and figure IV-3 present U.S. producers' and U.S. importers' U.S. shipments of overhead door springs by source and by wire diameter for 2023. *** of U.S. shipments of overhead door springs from all sources consisted of overhead door springs with a wire diameter between 5.1 mm and 12.7 mm, and *** were the only source of U.S. shipments of overhead door springs with a wire diameter between 12.7 mm and 20.4 mm. Whereas importers reported U.S. shipments of imports from China of *** wire diameters, importers reported shipments of imports from India only in the *** wire diameter category.

Table IV-5
Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and by wire diameter, 2023

Quantity in 1,000 pounds; mm is millimeters

Source	≥2.5 mm and <5.1 mm	≥5.1 mm and <12.7 mm	≥12.7 mm and ≤20.4 mm	All wire diameters
U.S. producers	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	---	---	---	---
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-5 Continued
Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and by wire diameter, 2023

Shares across in percent; mm is millimeters

Source	≥2.5 mm and <5.1 mm	≥5.1 mm and <12.7 mm	≥12.7 mm and ≤20.4 mm	All wire diameters
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
India	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	---	---	---	---
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-5 Continued
Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and by wire diameter, 2023

Shares down in percent; mm is millimeters

Source	≥2.5 mm and <5.1 mm	≥5.1 mm and <12.7 mm	≥12.7 mm and ≤20.4 mm	All wire diameters
U.S. producers	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	---	---	---	---
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-3
Overhead door springs: U.S. producers' and U.S. importers' U.S. shipments, by source and by wire diameter, 2023

* * * * *

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

Table IV-6 and figure IV-4 present U.S. producers' U.S. shipments and U.S. importers' imports by source and by level of assembly in 2023. U.S. producers' U.S. shipments in 2023 consisted *** of standalone springs, as were imports from ***. While the *** of imports from China consisted of standalone springs, importers did report *** from China, as well.

Table IV-6
Overhead door springs: U.S. producers' U.S. shipments and U.S. importers' imports, by source and by level of assembly, 2023

Quantity in 1,000 pounds

Source	Standalone springs	Springs within kits	Springs attached to other goods	All levels of assembly
U.S. producers	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	---	---	---	---
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-6 Continued
Overhead door springs: U.S. producers' U.S. shipments and U.S. importers' imports, by source and by level of assembly, 2023

Shares across in percent

Source	Standalone springs	Springs within kits	Springs attached to other goods	All levels of assembly
U.S. producers	***	***	***	100.0
China	***	***	***	100.0
India	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	---	---	---	---
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-6 Continued
Overhead door springs: U.S. producers' U.S. shipments and U.S. importers' imports, by source and by level of assembly, 2023

Shares down in percent

Source	Standalone springs	Springs within kits	Springs attached to other goods	All levels of assembly
U.S. producers	***	***	***	***
China	***	***	***	***
India	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	---	---	---	---
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

Note: "Standalone springs" are defined overhead door springs with or without cones, not in kits or further assembled. "Springs within kits" are defined as overhead door springs in kits. "Springs attached to other goods" are defined as overhead door springs as parts of components (e.g., motors, counterweight assemblies) or as parts of garage doors. 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 "---".

Figure IV-4
Overhead door springs: U.S. producers' U.S. shipments and U.S. importers' imports, by source and by level of assembly, 2023

* * * * *

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

Geographical markets

U.S. imports of helical springs entered through all borders of entry in 2023, although the Western border of entry had the lowest volumes of imports from both subject sources. With the exception of the Western border of entry, U.S. imports of helical springs from subject sources were evenly distributed across all borders of entry.

Table IV-7
Certain helical springs, of iron or steel: U.S. imports from China and India by source and border of entry, 2023

Quantity in 1,000 pounds

Source	East	North	South	West	All borders
China	4,484	5,217	5,498	3,475	18,674
India	319	478	261	9	1,066
Subject sources	4,803	5,695	5,758	3,484	19,740

Table continued.

Table IV-7 Continued
Certain helical springs, of iron or steel: U.S. imports from China and India by source and border of entry, 2023

Shares in percent

Source	East	North	South	West	All borders
China	24.0	27.9	29.4	18.6	100.0
India	29.9	44.8	24.4	0.8	100.0
Subject sources	24.3	28.8	29.2	17.7	100.0

Table continued.

Table IV-7 Continued
Certain helical springs, of iron or steel: U.S. imports from China and India by source and border of entry, 2023

Shares down in percent

Source	East	North	South	West	All borders
China	93.4	91.6	95.5	99.7	94.6
India	6.6	8.4	4.5	0.3	5.4
Subject sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060, accessed November 12, 2024. Imports are based on the imports for consumption data series.

Note: HTS numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060 include out of scope products and therefore these data for China and India are overstated. Imports from sources other than China and India under these statistical reporting numbers have been removed from this presentation based on record information indicating no confirmed or likely volumes of overhead door springs from nonsubject sources. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Presence in the market

U.S. imports of helical springs from China and India entered the U.S. market in each of the 45 months. From August 2022 to February 2022, imports from China rose to a level more than twice that of any month prior to that period. Following February 2022, imports from China declined irregularly to levels comparable to the first half of 2021, remaining below the higher levels from August 2021 to February 2022. Imports from India began to increase in the second half of 2023, and in 4 of 9 months in partial year 2024, imports from India entered the U.S. market in quantities higher than any month between January 2021 and December 2023. Nonsubject import sources had no presence in the U.S. market.

Table IV-8
Certain helical springs, of iron or steel: Quantity of U.S. imports, by source and month

Quantity in 1,000 pounds

Year	Month	China	India	Subject sources
2021	January	1,052	8	1,060
2021	February	1,452	2	1,454
2021	March	1,367	7	1,375
2021	April	1,944	6	1,950
2021	May	1,189	4	1,193
2021	June	1,835	17	1,852
2021	July	1,495	27	1,522
2021	August	1,759	91	1,850
2021	September	2,136	127	2,262
2021	October	2,448	70	2,518
2021	November	2,656	75	2,731
2021	December	3,484	16	3,500
2022	January	3,104	21	3,126
2022	February	4,006	15	4,020
2022	March	2,677	9	2,686
2022	April	3,388	53	3,441
2022	May	2,294	3	2,297
2022	June	3,149	130	3,279
2022	July	2,365	163	2,528
2022	August	1,772	95	1,868
2022	September	1,988	191	2,179
2022	October	2,183	124	2,306
2022	November	1,641	4	1,645
2022	December	1,599	23	1,622

Table continued.

Table IV-8 Continued
Certain helical springs, of iron or steel: Quantity of U.S. imports, by source and month

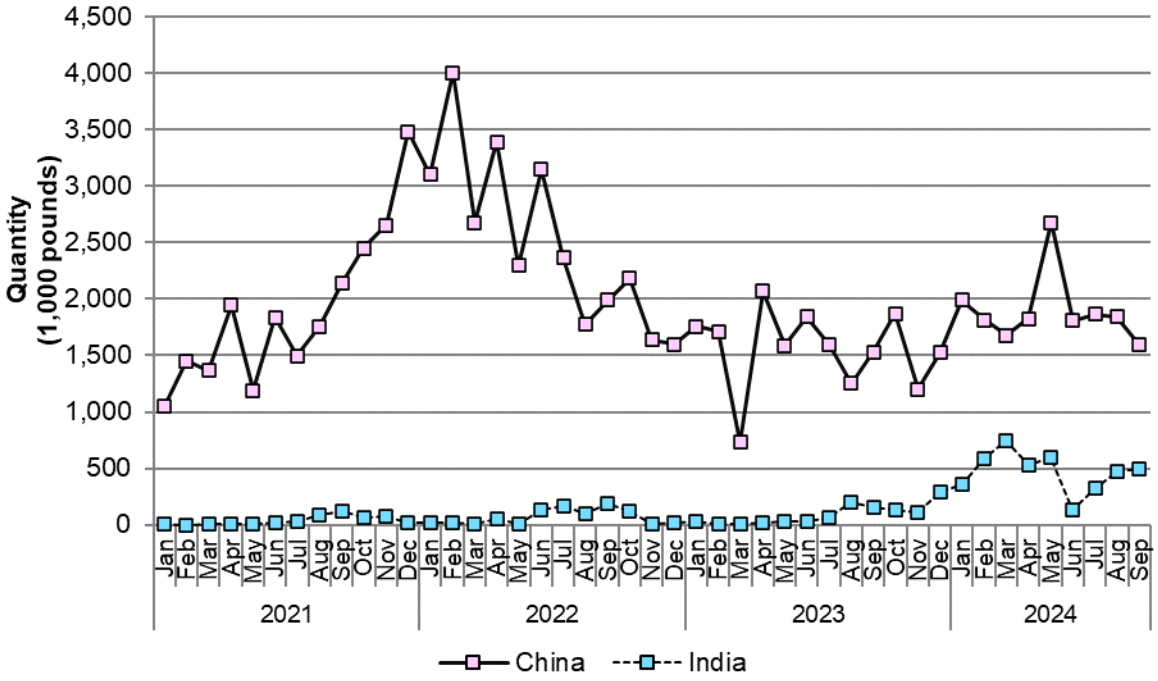
Quantity in 1,000 pounds

Year	Month	China	India	Subject sources
2023	January	1,760	26	1,786
2023	February	1,715	9	1,723
2023	March	732	12	744
2023	April	2,067	20	2,087
2023	May	1,586	26	1,613
2023	June	1,843	26	1,869
2023	July	1,593	66	1,660
2023	August	1,250	195	1,445
2023	September	1,531	151	1,682
2023	October	1,870	137	2,008
2023	November	1,202	105	1,307
2023	December	1,523	293	1,817
2024	January	1,987	358	2,346
2024	February	1,812	587	2,399
2024	March	1,678	744	2,422
2024	April	1,828	532	2,360
2024	May	2,674	592	3,266
2024	June	1,806	131	1,938
2024	July	1,867	328	2,194
2024	August	1,840	470	2,311
2024	September	1,593	500	2,093

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060, accessed November 12, 2024. Imports are based on the imports for consumption data series.

Note: HTS numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060 include out of scope products and therefore these data for China and India are overstated. Imports from sources other than China and India under these statistical reporting numbers have been removed from this presentation based on record information indicating no confirmed or likely volumes of overhead door springs from nonsubject sources. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-5
Certain helical springs, of iron or steel: U.S. imports from individual subject sources, by month



Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060, accessed November 12, 2024. Imports are based on the imports for consumption data series.

Note: HTS numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060 include out of scope products and therefore these data for China and India are overstated. Imports from sources other than China and India under these statistical reporting numbers have been removed from this presentation based on record information indicating no confirmed or likely volumes of overhead door springs from nonsubject sources. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Apparent U.S. consumption and market shares

Quantity

Table IV-9 and figure IV-6 present data on apparent U.S. consumption and U.S. market shares by quantity for overhead door springs. The share of apparent U.S. consumption, by quantity, accounted for by U.S. producers decreased by *** percentage points from 2021 to 2023. The decline in market share occurred as U.S. producers' U.S. shipments peaked 2022 and declined from 2022 to 2023 for a 2021-23 net decline of *** percent. Over this same period, the market share accounted for by imports from subject sources increased overall by *** percentage points, reflected in 2021-23 increases in the market share accounted for by both imports from China and India. Although the market share of imports from India decreased by *** percent from 2022 to 2023, the market share of subject imports nonetheless increased due to the increase in the share accounted for by imports from China.

In January-June 2024, despite higher quantities of U.S. shipments relative to January-June 2023, U.S. producers' market share was *** percentage points lower than in January-June 2023. Imports from China and from India were also higher in January-June 2024 than in January-June 2023, with imports from China more than twice as large in January-June 2024 relative to January-June 2023.

Table IV-9
Overhead door springs: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 pounds; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	3,454	10,648	11,009	4,112	8,317
India	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	---	---	---	---	---
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Subject 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 for sources other than China and from information submitted as part of the petition for China. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparison of available import datasets for China in the preliminary phase of these investigations.

Note: For imports from China, "Quantity" data reflect estimates of the volume of U.S. imports of overhead door springs included in the petition; "Unit value" data reflect average unit values for U.S. imports for consumption under HTS statistical reporting number 7320.20.5045; "Value" data reflect the product (i.e. multiplication) of "Quantity" and "Unit value" for each period. 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 “---“.

Figure IV-6
Overhead door springs: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires for sources other than China and from information submitted as part of the petition for China. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparison of available import datasets for China in the preliminary phase of these investigations.

Note: For imports from China, "Quantity" data reflect estimates of the volume of U.S. imports of overhead door springs included in the petition; "Unit value" data reflect average unit values for U.S. imports for consumption under HTS statistical reporting number 7320.20.5045; "Value" data reflect the product (i.e. multiplication) of "Quantity" and "Unit value" for each period.

Value

Table IV-10 and figure IV-7 present data on apparent U.S. consumption and U.S. market shares by value for overhead door springs. Apparent U.S. consumption of overhead door springs in the United States, by value, initially increased by *** percent from 2021 to 2022, then decreased by *** percent from 2022 to 2023, for net increase of *** percent during 2021-23. The overall trend reflected in the value of U.S. shipments by U.S. producers, which never accounted for less than *** percent of apparent U.S. consumption from 2021 to 2023. U.S. producers' market share during 2021-23 nonetheless declined by *** percentage points, as the market share of imports from China and from India increased by *** and *** percentage points, respectively, over the same period.

Total apparent consumption, by value, remained *** across the two January-June interim periods. U.S. producers' share of apparent consumption was *** percentage points lower in January-June 2024 than in January-June 2023. This was reflected in the value of U.S. producers' U.S. shipments of overhead door springs in January-June 2024 being lower than in January-June 2023, while the value of subject imports in January-June 2024 was higher than in January-June 2023.

Table IV-10
Overhead door springs: Apparent U.S. consumption and market shares based on value, 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	***	***	***	***	***
China	Value	5,076	12,504	14,107	5,306	13,078
India	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	---	---	---	---	---
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
India	Share	***	***	***	***	***
Subject 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 for sources other than China and from information submitted as part of the petition for China. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparison of available import datasets for China in the preliminary phase of these investigations.

Note: For imports from China, "Quantity" data reflect estimates of the volume of U.S. imports of overhead door springs included in the petition; "Unit value" data reflect average unit values for U.S. imports for consumption under HTS statistical reporting number 7320.20.5045; "Value" data reflect the product (i.e. multiplication) of "Quantity" and "Unit value" for each period. 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 “---“.

Figure IV-7
Overhead door springs: Apparent U.S. consumption based on value, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires for sources other than China and from information submitted as part of the petition for China. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparison of available import datasets for China in the preliminary phase of these investigations.

Note: For imports from China, "Quantity" data reflect estimates of the volume of U.S. imports of overhead door springs included in the petition; "Unit value" data reflect average unit values for U.S. imports for consumption under HTS statistical reporting number 7320.20.5045; "Value" data reflect the product (i.e. multiplication) of "Quantity" and "Unit value" for each period.

Part V: Pricing data

Factors affecting prices

Raw material costs

Overhead door springs are produced by winding raw wire (typically high carbon steel wire containing 0.55 percent carbon or more), heat treating it, and coating and finishing it.[1] Overhead door springs are made with a wide variety of wire types, including but not limited to oil-tempered wire, hard-drawn wire, music wire, galvanized wire, and black or other coated wire.[2] The prices for high carbon steel wire rod (the primary input from which wire is drawn) increased by *** percent from January 2021 to April 2022, then declined irregularly by *** percent through October 2024. High carbon wire steel rod prices increased by *** percent between January 2021 and June 2024, followed by a slight increase by *** percent from June to October 2024 (figure V-1 and table V-1). Raw materials, as a share of U.S. producers' cost of goods sold (COGS), increased slightly from *** percent in 2021 to *** percent in 2022 then decreased to *** percent in 2023, and were *** percent in January-June 2024.

Half of the U.S. producers[3] and most responding importers reported that the cost of raw materials steadily increased or fluctuated upward since January 1, 2021. Firms generally reported that costs that rose during the COVID-19 pandemic have been slow to come down due to softer demand and inflation. U.S. producer *** reported that since the COVID-19 pandemic, implementation of section 232 tariffs, and increase in labor cost due to inflation and labor shortages, U.S. raw material prices doubled or even tripled and never went back to the cost level before the pandemic. Importer *** reported that raw material price increases have driven prices higher to cover costs and profit. Petitioners stated that they buy raw materials on a spot basis and that, notwithstanding raw material input, every other input of cost of production has increased over the last several years: energy, labor, employee benefits, commercial property liability insurance, consumables, torch tips, forklift, repairs, etc.[4]

[1] Petition, p. 12.

[2] Petition, p. 9.

[3] Overhead Door Corporation did not provide a completed or partial U.S. producer questionnaire in time to be incorporated into the staff report.

[4] Conference transcript, p. 61 (Bianco) and p. 62 (Boldenow and Bianco).

Figure V-1
Raw materials: High carbon steel wire rod, January 2021–October 2024

* * * * * * *

Source: *** retrieved November 8, 2024.

Table V-1
Raw materials: High carbon steel wire rod, January 2021–October 2024

Price in dollars per hundred weight

Month	2021	2022	2023	2024
January	***	***	***	***
February	***	***	***	***
March	***	***	***	***
April	***	***	***	***
May	***	***	***	***
June	***	***	***	***
July	***	***	***	***
August	***	***	***	***
September	***	***	***	***
October	***	***	***	***
November	***	***	***	NA
December	***	***	***	NA

Source: *** retrieved November 8, 2024.

Firms were also asked about the impact of the section 232 tariffs on steel and aluminum on raw material costs and the price of overhead door springs. With respect to the impact on raw material costs, importer *** reported that the section 232 tariffs have driven raw material pricing significantly higher in domestic markets. U.S. producer *** reported that the section 232 measures protect the domestic steel mills which are its raw material suppliers, and it would not be able to use overseas raw material

as competitively as Chinese manufacturers and Indian manufacturers. All responding producers and importers stated that they increased their prices of overhead door springs in order to cover the increased raw material costs. Importer *** reported that initially, it aimed to support the local garage door sales market by sourcing springs domestically; however, during the pandemic, significant domestic shortages and high prices made it impossible to meet both its customers' price expectations and delivery timelines. Importer *** reported that the last five years has seen the largest price hike for overhead door springs than the previous 20 years combined.

Transportation costs to the U.S. market

Transportation costs for overhead door springs shipped from subject countries to the United States averaged 7.5 percent for China and 6.4 percent for India during 2023. These estimates were derived from official import data and represent the transportation and other charges on imports.[5]

U.S. inland transportation costs

Most U.S. producers and importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from 2 to 6 percent while most responding importers reported costs of 2 to 10 percent.

Pricing practices

Pricing methods

Most U.S. producers and importers reported setting prices using transaction-by-transaction negotiations and/or price lists (table V-2).

[5] 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 7320.20.5020, 7320.20.5045, and 7320.20.5060, accessed November 5, 2024. Imports area based on the imports for consumption data series.

Table V-2
Overhead door springs: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	U.S. Importers
Transaction-by-transaction	3	4
Contract	1	1
Set price list	3	4
Other	0	1
Responding firms	4	8

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 overhead door springs in the spot market, with a substantial share sold under short-term contracts. Importers reported selling most of their overhead door springs in the spot market, with the remaining share sold under long-term contracts (table V-3). U.S. producer *** reported that its short-term contracts last 30 days, and its short-term and annual contracts fix price, are indexed to raw materials, and do not allow for price renegotiation. Importer *** reported its long-term contracts last three years, are indexed to raw materials and do not allow for price renegotiation.

Table V-3
Overhead door springs: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2023

Share in percent

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

Sales terms and discounts

U.S. producers and half of responding importers typically quote prices on an f.o.b. basis, while the other half of responding importers quote prices on a delivered basis. Two U.S. producers, ***, offer quantity discounts and total volume discounts, and two U.S. producers, ***, offer early payment discounts. Although most (six) importers do not have discount policies, three offer quantity discounts and one offers total volume discounts.

Price and purchase cost 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 overhead door springs products shipped to unrelated U.S. customers during January 2021 to June 2024. Firms that imported these products from China and India for internal consumption were requested to provide import purchase cost data.

***Product 1*.-- Residential garage door torsion spring with the following characteristics:**

a. Wire diameter 0.207" – 0.234"
b. Inner diameter 1.750" – 2.625"
c. Overall length 20" – 40"
d. Left wound or right wound
e. Description stenciled on spring
f. Aluminum castings/cones installed

***Product 2*.-- Residential garage door torsion spring with the following characteristics:**

a. Wire diameter 0.243" – 0.262"
b. Inner diameter 1.750" – 2.625"
c. Overall length 20" – 40"
d. Left wound or right wound
e. Description stenciled on spring
f. Aluminum castings/cones installed

***Product 3*.-- Commercial garage door torsion spring with the following characteristics:**

a. Wire diameter 0.273" – 0.362"
b. Inner diameter 2.500" – 6.000"
c. Overall length 35" – 65"
d. Left wound or right wound
e. Description stenciled on spring
f. Aluminum castings/cones installed

***Product 4*.-- Long length spring with the following characteristics:**

a. Wire diameter 0.192" – 0.437"
b. Inner diameter 1.750" – 6.000"
c. Overall length 96" – 144"
d. Left wound or right wound
e. Description stenciled on spring
f. Plain ends – no aluminum castings/cones installed

Price data

Four U.S. producers and five importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.[6] [7] Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of overhead door springs, *** percent of subject imports from China and *** percent of subject imports from India from January 2021 to June 2024. Price data for products 1-4 are presented in tables V-4 to V-7 and figures V-2 to V-5.

[6] Per-pound 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.

[7] Importer *** reported sales price and purchase cost data for one quarter each for products 1 and 2. However, it reported the quantities and values in number of springs rather than in pounds and it was unable to convert the number of springs to pounds. Staff has excluded *** price and purchase cost data. Importer *** reported a return larger than the total volume of sales in Q3 2023 for products 1 and 3, resulting in negative quantities and values. Staff has excluded these negative values. Importer *** reported price data for sales of overhead door springs from China and India for product 2 in Q4 2022, Q1 2023, and Q2 2023; however, the company ***. Staff has excluded *** price data.

Table V-4
Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound, quantity in pounds, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	India price	India quantity	India 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: Residential garage door torsion spring with the following characteristics: Wire diameter 0.207” – 0.234”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Table V-5
Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound, quantity in pounds, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	India price	India quantity	India 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: Residential garage door torsion spring with the following characteristics: Wire diameter 0.243” – 0.262”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Table V-6
Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound, quantity in pounds, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	India price	India quantity	India 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: Commercial garage door torsion spring with the following characteristics: Wire diameter 0.273” – 0.362”, Inner diameter 2.500” – 6.000”, Overall length 35” – 65”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Table V-7
Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per pound, quantity in pounds, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	India price	India quantity	India 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: Long length spring with the following characteristics: Wire diameter 0.192” – 0.437”, Inner diameter 1.750” – 6.000”, Overall length 96” – 144”, Left wound or right wound, Description stenciled on spring, Plain ends – no aluminum castings/cones installed.

Figure V-2
Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Residential garage door torsion spring with the following characteristics: Wire diameter 0.207” – 0.234”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Figure V-3
Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Residential garage door torsion spring with the following characteristics: Wire diameter 0.243” – 0.262”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Figure V-4
Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Commercial garage door torsion spring with the following characteristics: Wire diameter 0.273” – 0.362”, Inner diameter 2.500” – 6.000”, Overall length 35” – 65”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Figure V-5
Overhead door springs: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4

* * * * * * *

Volume of product 4

* * * * * * *

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

Note: Product 4: Long length spring with the following characteristics: Wire diameter 0.192” – 0.437”, Inner diameter 1.750” – 6.000”, Overall length 96” – 144”, Left wound or right wound, Description stenciled on spring, Plain ends – no aluminum castings/cones installed.

Import purchase cost data

Five importers reported useable import purchase cost data for products 1-4.[8] Purchase cost data reported by these firms accounted for *** percent of imports from China and *** percent of imports from India from January 2021 to June 2024. Landed duty-paid purchase cost data for imports from China and India are presented in tables V-8 to V-10, along with U.S. producers' sales prices.[9] [10]

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of importing overhead door springs themselves.

Two of eight importers reported that they incurred additional costs beyond landed duty-paid costs by importing overhead door springs themselves rather than purchasing from a U.S. producer or U.S. importer. Of these, one importer (***) estimated the total additional cost incurred to be 17 percent compared to the landed duty-paid value. Firms were also asked to identify specific additional costs they incurred as a result of importing overhead door springs. Importer *** reported shipping costs equivalent to 20 percent of the landed, duty-paid cost. It also reported research costs, specifically spending weeks finding producers of overhead door springs, traveling to their factories in China, product testing, and establishing trade solutions, all of which it had not had to do when it only purchased U.S. overhead door springs.

Firms were also asked to describe how these additional costs incurred by importing overhead door springs themselves compares with additional costs incurred when purchasing from a U.S. producer or U.S. importer. Importer *** reported that it is cheaper to buy springs from China and India because labor and spring wire are cheaper, even with paying shipping fees and tariffs. It continued that its competitors have been forcing its prices down to the point where it has to buy offshore to keep margins up a little. It added that it costs more to use domestic suppliers, but their lead times are better, and that U.S. producers were loyal during the pandemic and sold *** what they could. Importer *** reported that it was not able to buy from U.S. producers and importers at the beginning of the COVID-19 pandemic, then it was able to buy but at a much higher cost (3 to 4 times the pre-

[8] Importer *** provided incomplete purchase cost data for overhead door springs from China for product 1. Staff excluded *** from the purchase cost data set.

[9] LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differences are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

[10] No importers reported purchase cost data for product 4.

pandemic costs in some cases). It continued that it has established relationships with other foreign producers and the foreign producers' prices are still roughly 10-15 percent less than the U.S. producers.

Eight of ten importers reported that they compare costs of importing to the cost of purchasing from a U.S. producer in determining whether to import overhead door springs, four importers compare costs to purchasing from a U.S. importer, and two importers do not compare costs of purchasing from either U.S. producers or importers.

Eight importers identified benefits from importing overhead door springs themselves instead of purchasing from U.S. producers or importers, including getting the supply of overhead springs needed to fulfill orders when U.S. producers would not sell, stable supply chain, cost savings, and better quality.[11]

Firms were also asked whether the import cost (both excluding and including additional costs) of overhead door springs they imported are lower than the price of purchasing overhead door springs from a U.S. producer or importer. Seven importers reported that their import cost not including additional costs is lower than U.S. producers and importers, and six importers reported their import cost is lower when including additional costs.

One importer estimated that it saved *** percent of the purchase price by importing overhead door springs rather than purchasing from a U.S. importer, and five importers reported saving between *** percent compared to purchasing the product from a U.S. producer.[12] [13]

[11] Importer *** stated that ***

[12] Importer *** estimated saving *** percent of the purchase price by importing overhead door springs themselves.

[13] Seven firms reported that they based their estimates on previous company transactions, five reported basing their estimates on market research, and four reported other bases for their estimates. Importer ***. Importer *** reported that ***

Table V-8
Overhead door springs: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter

Price and LDP value in dollars per pound, quantity in pounds, price-cost differential in percent.

Period	U.S. price	U.S. quantity	China LDP unit cost	China quantity	China Price-cost differential	India LDP unit cost	India quantity	India Price-cost differential
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: Residential garage door torsion spring with the following characteristics: Wire diameter 0.207” – 0.234”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Note: U.S. producer price data is the same as those presented in table V-4.

Table V-9
Overhead door springs: Import landed duty-paid purchase costs and domestic prices, quantities of product 2, and price-cost differentials, by quarter

Price and LDP value in dollars per pound, quantity in pounds, price-cost differential in percent.

Period	U.S. price	U.S. quantity	China LDP unit cost	China quantity	China Price-cost differential	India LDP unit cost	India quantity	India Price-cost differential
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: Residential garage door torsion spring with the following characteristics: Wire diameter 0.243” – 0.262”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Note: U.S. producer price data is the same as those presented in table V-5.

Table V-10
Overhead door springs: Import landed duty-paid purchase costs and domestic prices, quantities of product 3, and price-cost differentials, by quarter

Price and LDP value in dollars per pound, quantity in pounds, price-cost differential in percent.

Period	U.S. price	U.S. quantity	China LDP unit cost	China quantity	China Price-cost differential
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: Commercial garage door torsion spring with the following characteristics: Wire diameter 0.273” – 0.362”, Inner diameter 2.500” – 6.000”, Overall length 35” – 65”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Note: U.S. producer price data is the same as those presented in table V-6**.**

Figure V-6
Overhead door springs: U.S. producer prices and import purchase costs, and quantities, of product 1, by quarter

U.S. price and import purchase cost of product 1

* * * * * * *

Volume of product 1

* * * * * * *

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

Note: Product 1: Residential garage door torsion spring with the following characteristics: Wire diameter 0.207” – 0.234”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Figure V-7
Overhead door springs: U.S. producer prices and import purchase costs, and quantities, of product 2, by quarter

U.S. price and import purchase cost of product 2

* * * * * * *

Volume of product 2

* * * * * * *

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

Note: Product 2: Residential garage door torsion spring with the following characteristics: Wire diameter 0.243” – 0.262”, Inner diameter 1.750” – 2.625”, Overall length 20” – 40”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Figure V-8
Overhead door springs: U.S. producer prices and import purchase costs, and quantities, of product 3, by quarter

U.S. price and import purchase cost of product 3

* * * * * * *

Volume of product 3

* * * * * * *

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

Note: Product 3: Commercial garage door torsion spring with the following characteristics: Wire diameter 0.273” – 0.362”, Inner diameter 2.500” – 6.000”, Overall length 35” – 65”, Left wound or right wound, Description stenciled on spring, Aluminum castings/cones installed.

Price and purchase cost trends

Table V-11 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from *** percent during January 2021 to June 2024. Import price and purchase cost data were too sporadic to discern any particular trends.

Table V-11
Overhead door springs: Summary of price and cost data, by product and source

Quantity in pounds, price and cost in dollars per pound

Product	Source	Number of quarters	Quantity	Low price/unit LDP value	High price/unit LDP value	First quarter price/unit LDP value	Last quarter price/unit LDP value	Percent change in price/cost over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China price	***	***	***	***	***	***	***
Product 1	India price	***	***	***	***	***	***	***
Product 1	China cost	***	***	***	***	***	***	***
Product 1	India cost	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	China price	***	***	***	***	***	***	***
Product 2	India price	***	***	***	***	***	***	***
Product 2	China cost	***	***	***	***	***	***	***
Product 2	India cost	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	China price	***	***	***	***	***	***	***
Product 3	India price	***	***	***	***	***	***	***
Product 3	China cost	***	***	***	***	***	***	***
Product 3	India cost	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	China price	***	***	***	***	***	***	***
Product 4	India price	***	***	***	***	***	***	***
Product 4	China cost	***	***	***	***	***	***	***
Product 4	India cost	***	***	***	***	***	***	***

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

Note: Percentage change from the first quarter in which data were available in 2021 to the last quarter in which data were available in 2024.

As can be seen in figure V-9 and table V-12, U.S. producer prices increased substantially from the first quarter of 2021 to the second quarter of 2022 before steadily declining until the second quarter of 2024.

Figure V-9
Overhead door springs: Indexed U.S. producer prices, by quarter

* * * * * * *

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

Table V-12
Overhead door springs: Indexed U.S. producer prices, by quarter

Price index in percent; 2021 Q1 = 100.0

Period	Product 1	Product 2	Product 3	Product 4
2021 Q1	100.0	100.0	100.0	100.0
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.

Price and purchase cost comparisons

Price comparisons

As shown in tables V-13 through V-15, prices for product imported from China and India were below those for U.S.-produced product in 25 of 30 instances (*** pounds); margins of underselling ranged from *** to *** percent. In the remaining 5 instances (*** pounds), prices for product from China and India were between *** and *** percent above prices for the domestic product.

Table V-13
Overhead door springs: Instances of underselling and overselling and the range and average of margins, by product

Quantity in pounds; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	10	***	***	***	***
Product 2	Underselling	9	***	***	***	***
Product 3	Underselling	2	***	***	***	***
Product 4	Underselling	4	***	***	***	***
Total	Underselling	25	***	***	***	***
Product 1	Overselling	5	***	***	***	***
Product 2	Overselling	---	***	***	***	***
Product 3	Overselling	---	***	***	***	***
Product 4	Overselling	---	***	***	***	***
Total	Overselling	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 subject product.

Table V-14
Overhead door springs: Instances of underselling and overselling and the range and average of margins, by source

Quantity in pounds; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	8	***	***	***	***
India	Underselling	17	***	***	***	***
Total	Underselling	25	***	***	***	***
China	Overselling	5	***	***	***	***
India	Overselling	---	***	***	***	***
Total	Overselling	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 subject product.

Table V-15
Overhead door springs: Instances of underselling and overselling and the range and average of margins, by year

Quantity in pounds; margin in percent

Year	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2021	Underselling	---	***	***	***	***
2022	Underselling	14	***	***	***	***
2023	Underselling	6	***	***	***	***
Jan-Jun 2024	Underselling	5	***	***	***	***
Total, all years	Underselling	25	***	***	***	***
2021	Overselling	1	***	***	***	***
2022	Overselling	2	***	***	***	***
2023	Overselling	2	***	***	***	***
Jan-Jun 2024	Overselling	---	***	***	***	***
Total, all years	Overselling	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 subject product.

Price-cost comparisons

As shown in tables V-16 through V-18, landed duty-paid costs for overhead door springs imported from China and India were below the sales price for U.S.-produced product in all 32 instances (*** pounds); price-cost differentials ranged from *** to *** percent.

Table V-16
Overhead door springs: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by product

Quantity in pounds; price-cost differential in percent

Product	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
Product 1	Lower than U.S. price	16	***	***	***	***
Product 2	Lower than U.S. price	12	***	***	***	***
Product 3	Lower than U.S. price	4	***	***	***	***
Product 4	Lower than U.S. price	---	***	***	***	***
Total	Lower than U.S. price	32	***	***	***	***
Product 1	Higher than U.S. price	---	***	***	***	***
Product 2	Higher than U.S. price	---	***	***	***	***
Product 3	Higher than U.S. price	---	***	***	***	***
Product 4	Higher than U.S. price	---	***	***	***	***
Total	Higher than U.S. price	---	***	***	---	---

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 subject product.

Table V-17
Overhead door springs: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by source

Quantity in pounds; price-cost differential in percent

Source	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
China	Lower than U.S. price	21	***	***	***	***
India	Lower than U.S. price	11	***	***	***	***
Total	Lower than U.S. price	32	***	***	***	***
China	Higher than U.S. price	---	***	***	***	***
India	Higher than U.S. price	---	***	***	***	***
Total	Higher than U.S. price	---	***	***	---	---

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 subject product.

Table V-18
Overhead door springs: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by year

Quantity in pounds; margin in percent

Year	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
2021	Lower than U.S. price	2	***	***	***	***
2022	Lower than U.S. price	10	***	***	***	***
2023	Lower than U.S. price	11	***	***	***	***
Jan-Jun 2024	Lower than U.S. price	9	***	***	***	***
Total, all years	Lower than U.S. price	32	***	***	***	***
2021	Higher than U.S. price	---	***	***	***	***
2022	Higher than U.S. price	---	***	***	***	***
2023	Higher than U.S. price	---	***	***	***	***
Jan-Jun 2024	Higher than U.S. price	---	***	***	***	***
Total, all years	Higher than U.S. price	---	***	***	---	---

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 subject product.

Lost sales and lost revenue

The Commission requested that U.S. producers of overhead door springs report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of overhead door springs from China and India during January 2021 to June 2024. Of the four responding U.S. producers, three reported that they had to reduce prices, three reported they had to roll back announced price increases, and four reported that they had lost sales. Three U.S. producers (the petitioners) submitted lost sales and lost revenue allegations. Petitioners identified 35 firms with which they lost sales or revenue (17 consisting of lost sales allegations and 18 consisting of both types of allegations). These alleged lost sales or lost revenue transactions occurred during 2023 and 2024 and the majority were specifically with respect to competing imports from China.[14]

Staff contacted 35 purchasers and received responses from seven purchasers. Responding purchasers reported purchasing *** pounds of overhead door springs during January 2021 to June 2024 (table V-19).

[14] Thirty allegations specifically with respect to China, four with respect to India, and one to both sources.

Table V-19
Overhead door springs: Purchasers' reported purchases and imports, by firm and source

Quantity in 1,000 pounds, Change in shares in percentage points

Purchaser	Domestic quantity	Subject quantity	All other quantity	Change in domestic share	Change in subject country share
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	***	***	***	***	***

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 subject country imports between first and last years and are presented in percentage points. Zeroes, null values, and undefined calculations are suppressed and shown as "---". *** reported purchasing *** of overhead door springs during the period for which data were collected.

During 2023, responding purchasers purchased 96.3 percent from U.S. producers, 2.8 percent from China, and 0.9 percent from India. Purchasers were asked about changes in their purchasing patterns from different sources since January 1, 2021. As shown in table V-20, of the responding purchasers, three reported decreased purchases from domestic producers, two reported increased purchases, and one reported no change.[15] Explanations for increased domestic purchases included business growth and increase in downstream product production. Explanations for decreased domestic purchases included domestic springs were not available in the volume required, Chinese springs cheaper, monopolistic market strategies, "inflated price gouging," "unfair pricing strategy against small family-owned dealer businesses in 2021-22," and purchasing exclusivity guarantee demands from some U.S producers. Reasons for increased purchases of Chinese product were Chinese springs were cheaper and of similar quality, and "alternate supply chain solution with different grade product at competitive pricing to ensure that U.S. producers remain competitive" and "more importantly cannot hold small businesses at ransom like they did in the past." Reasons for increased purchases from India were increase in downstream product production, better quality and packaging, domestic producer not able to allocate more material for orders, new source introduced for shot-peened springs not available from a non-competitor domestic source.

[15] Of the seven responding purchasers, one purchaser indicated that they did not know the source of the overhead door springs they purchased.

Table V-20
Overhead door springs: Count of changes in purchase patterns from U.S., subject, and nonsubject countries

Count in number of firms reporting

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Did not purchase
United States	1	1	1	2	1	0
China	2	1	0	0	0	2
India	0	3	0	1	0	1
Nonsubject sources	0	0	0	0	0	4
Sources unknown	0	0	1	0	0	4

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

Of the six responding purchasers, five reported that, since 2021, they had purchased imported overhead door springs from China (three firms) and India (three firms) instead of U.S.-produced product. Four of these purchasers reported that subject 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 overhead door springs from China and India purchased instead of domestic product; quantities ranged from *** pounds (with respect to China) to *** pounds (with respect to India) (table V-21). Purchasers identified quality, packaging, customer feedback, availability, domestic producer not able to allocate more material for increased production orders to be requested, and domestic supplier could not supply shot-peened springs without outsourcing as non-price reasons for purchasing imported rather than U.S.-produced product.[16]

[16] Petitioner IDC Spring stated that it outsources finishing operations other than black painting, Serive Spring and Iowa spring can provide additional finishing processing internally or will outsource when capacity is reached on those finishing lines. Conference transcript, p. 65 (Boldenow, McAlear, and Bianco). Petitioner Iowa Spring contends that there's a cost difference to whether they internally process or externally process powder coating, shot-peening, or other coatings, there is a cost difference "that our customers aren't willing to pay and they're expecting that price sold be the same" as if {the coating} was being applied internally or externally. Conference transcript, p. 66 (Bianco).

Table V-21
Overhead door springs: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 pounds

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--5; No--2	Yes--4; No--2	Yes--2; No--3	***	NA

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

Table V-22
Overhead door springs: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Quantity in 1,000 pounds

Source	Count of purchasers reporting subject instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
China	3	3	1	***
India	3	2	1	***
Any subject source	5	4	2	***

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

Of the six responding purchasers, three reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; three reported that they did not know (tables V-23 and V-24). The reported estimated price reduction ranged from *** percent to *** percent.

Table V-23
Overhead door springs: Purchasers' responses to U.S. producer price reductions, by firm

Purchaser	Reported producers lowered prices	Estimated percent of U.S. price reduction	Explanation
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
All firms	Yes--3; No--0	***	NA

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

Table V-24
Overhead door springs: Purchasers' responses to U.S. producer price reductions, by source

Source	Count of purchasers reporting U.S. producers reduced prices	Average percent of estimated U.S. price reduction	Range of percent of estimated U.S. price reductions
China	3	***	***
India	1	***	***
Total / average	3	***	***

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

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics. Purchaser *** reported that U.S. producers took advantage of the market in 2021-22 to the extent that it forced many small-medium size purchasers to look for alternate options and its purchases of imported spring are a direct reaction to "monopolistic, heavy handed market strategies from some of U.S. producers." Purchaser *** reported that it conducted blind focus groups to test springs performance and its customers chose product with imported springs used. Purchaser *** reported that it wants to buy from U.S. suppliers, but its competitors have been sourcing from India and China, so it has had to do the same sometimes to stay price competitive. Purchaser *** reported that it commenced an initiative to provide shot-peened and powder-coated springs for its premium doors that have a cycle life 1.5-2 times longer than standard-coated oil-tempered springs as a way to differentiate itself in the market and that, at the time of the initiative, this product was not available domestically from a non-competitor and its primary domestic source declined to manufacture this type of spring in the volumes it needed to support its business.

Part VI: Financial experience of U.S. producers

Background[1]

Three U.S producers (IDC Spring, Iowa Spring, Service Spring) reported usable financial results on their U.S. overhead door springs operations.[2] All three are privately-held companies. The financial results presented in this report are based on information from accounting systems designed to generate/report overall financial results on the basis of U.S. GAAP.[3]

Figure VI-1 presents each responding firm's share of total reported net sales quantity in 2023.

Figure VI-1
Overhead door springs: U.S. producers' share of net sales quantity in 2023, by firm

* * * * * * *

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

[1] The following abbreviations may be 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"), and return on assets ("ROA").

[2] ***. USITC auditor notes (preliminary phase).

[3] U.S. producer questionnaires, section III-2.B.4. All U.S. producers reported their annual financial results on a calendar year basis.

Operations on overhead door springs

Table VI-1 and table VI-2 present income-and-loss data for the U.S. producers' overhead door springs and corresponding changes in AUVs, respectively. Table VI-3 presents a variance analysis of the financial results.[4] Appendix F presents selected company-specific financial information.

Table VI-1
Overhead door springs: U.S. producers' results of operations, by item and period

Quantity in 1,000 pounds; value in 1,000 dollars

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw materials	Value	***	***	***	***	***
COGS: Direct labor	Value	***	***	***	***	***
COGS: Other factory	Value	***	***	***	***	***
COGS: Subtotal conversion costs	Value	***	***	***	***	***
COGS: Total	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization included above	Value	***	***	***	***	***
Estimated cash flow from operations	Value	***	***	***	***	***

Table continued.

[4] The Commission's variance analysis is calculated in three parts: sales variance, COGS variance, and SG&A expenses 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 expenses 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. As summarized at the bottom of the variance analysis, 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 expenses variances. The Commission's variance analysis is more meaningful when product mix remains the same throughout the period. As noted in the *Net sales* section below, U.S. producers indicated that their product mix did not change notably during the period.

Table VI-1 Continued
Overhead door springs: U.S. producers' results of operations, by item and period

Ratios in percent; shares in percent; unit values in dollars per pound; count in number of firms reporting

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
COGS: Raw materials	Ratio to NS	***	***	***	***	***
COGS: Direct labor	Ratio to NS	***	***	***	***	***
COGS: Other factory	Ratio to NS	***	***	***	***	***
COGS: Subtotal conversion costs	Ratio to NS	***	***	***	***	***
COGS: Total	Ratio to NS	***	***	***	***	***
Gross profit or (loss)	Ratio to NS	***	***	***	***	***
SG&A expenses	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***
COGS: Raw materials	Share of COGS	***	***	***	***	***
COGS: Direct labor	Share of COGS	***	***	***	***	***
COGS: Other factory	Share of COGS	***	***	***	***	***
COGS: Subtotal conversion costs	Share of COGS	***	***	***	***	***
COGS: Total	Share of COGS	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Raw materials	Unit value	***	***	***	***	***
COGS: Direct labor	Unit value	***	***	***	***	***
COGS: Other factory	Unit value	***	***	***	***	***
COGS: Subtotal conversion costs	Unit value	***	***	***	***	***
COGS: Total	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Note: Conversion costs are the sum of direct labor cost and other factory costs. In order to mitigate differences in company-specific cost assignment of direct labor cost and other factory costs by the responding U.S. producers, conversion costs are presented in this table as supplemental information.

Table VI-2
Overhead door springs: Changes in AUVs between comparison periods

Changes in percent

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Total net sales	***	***	***	***
COGS: Raw materials	***	***	***	***
COGS: Direct labor	***	***	***	***
COGS: Other factory	***	***	***	***
COGS: Subtotal conversion costs	***	***	***	***
COGS: Total	***	***	***	***

Table continued.

Table VI-2 Continued
Overhead door springs: Changes in AUVs between comparison periods

Changes in dollars per pound

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Total net sales	***	***	***	***
COGS: Raw materials	***	***	***	***
COGS: Direct labor	***	***	***	***
COGS: Other factory	***	***	***	***
COGS: Subtotal conversion costs	***	***	***	***
COGS: Total	***	***	***	***
Gross profit or (loss)	***	***	***	***
SG&A expenses	***	***	***	***
Operating income or (loss)	***	***	***	***
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.

Note: Conversion costs are the sum of direct labor cost and other factory costs. In order to mitigate differences in company-specific cost assignment of direct labor cost and other factory costs by the responding U.S. producers, conversion costs are presented in this table as supplemental information.

Table VI-3
Overhead door springs: Variance analysis on the operations of the 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	***	***	***	***
Net sales volume variance	***	***	***	***
Net sales total variance	***	***	***	***
COGS cost variance	***	***	***	***
COGS volume variance	***	***	***	***
COGS total variance	***	***	***	***
Gross profit variance	***	***	***	***
SG&A cost variance	***	***	***	***
SG&A volume variance	***	***	***	***
SG&A total variance	***	***	***	***
Operating income price variance	***	***	***	***
Operating income cost variance	***	***	***	***
Operating income volume variance	***	***	***	***
Operating income total variance	***	***	***	***

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).

Net sales

Sales of overhead door springs are primarily made on a spot basis with limited instances of a direct raw material pass through.[5] Two of the three U.S. producers (IDC Spring and Iowa Spring) produce only to order. In contrast, Service Spring produces to order for a majority of its sales but also produces for inventory at its distribution centers.[6] Although the U.S. producers sell to all primary customer groups, IDC Spring and Iowa Spring are focused on OEMs, while Service Spring is focused on garage door dealers and installers, as well as distributors.[7]

The U.S. industry's net sales primarily reflect U.S. commercial sales with export commercial sales accounting for the remainder. Since the only category of sales reported is commercial sales, a single line item for sales is presented in the relevant tables above.

[5] Conference transcript, p. 60 (Boldenow), pp. 60-61 (Cannon).

[6] Conference transcript, p. 66 (Bianco, Boldenow, McAlear). ***. Petitioners' postconference brief (Exhibit 6, p. 1).

[7] Conference transcript, p. 46 (Boldenow), p. 47 (McAlear, Bianco).

Quantity

Demand for overhead door springs was reportedly strong in 2021 and continued to increase in 2022,[8] declined in 2023,[9] and then was somewhat higher in January-June 2024 compared to January-June 2023.[10] This pattern is generally reflected in the U.S. industry's total net sales quantity (increasing in 2022, declining in 2023, and modestly higher between the interim periods).

While U.S. producers were directionally uniform during the full-year period (reporting increases in total net sales quantity in 2022 and declines in 2023),[11] the magnitude of company-specific changes varied (see table F-1). *** reported relatively large percentage increases in total net sales quantity in 2022, followed by declines in 2023. In contrast, *** reported a smaller increase and decrease in net sales quantity during the full-year period. Directionally, the U.S. producers diverged between the interim periods: *** reported lower sales quantity in January-June 2024 compared to January-June 2023, while *** reported higher sales quantity.[12]

Value

Overhead door springs represent a wide range of end use applications (residential garage doors, commercial garage doors, rolling or curtain doors, truck and trailer doors) and

[8] Conference transcript, pp. 6-7 (Cannon).

[9] Conference transcript, p. 12 (Boldenow).

[10] Petitioners' post conference brief, p. 10.

[11] As described by an IDC Spring company official, "The market for overhead door springs in 2022 was booming, driven by new construction for both residential and commercial buildings, as well as home improvement." Conference transcript, p. 11 (Boldenow).

[12] ***. Email with attachments from ***, November 22, 2024.

physical characteristics; e.g., length, wire type, wire and coil diameter.[13] [14] Presumably reflecting differences in both customer and product mix, table F-1 shows that U.S. producers' average per pound net sales values cover a relatively wide range.[15]

Directionally, *** U.S. producers reported relatively large increases in average per pound net sales values in 2022, followed by declines of varying magnitude in 2023 and between the interim period. As shown in table VI-2 and while magnitudes varied, average per pound net sales value and raw material cost were directionally the same throughout the period. To the extent that all U.S. producers indicated that product mix did not change notably during the period,[16] a primary driver of overall and company-specific changes in average per pound net sales value appears to be raw material cost.

Table VI-1 shows that the U.S. industry's total net sales value followed the same directional pattern of net sales quantity during the full-year period (both increasing in 2022 and declining in 2023) but diverged between the interim periods (total net sales value was lower in January-June 2024 compared to January-June 2023, while total net sales quantity was modestly higher). The sales section of the variance analysis (table VI-3) shows that the increase in the U.S. industry's total net sales value in 2022 was primarily due to a positive price variance with a smaller positive sales volume variance also contributing. In contrast, the decline in total net sales value in 2023 reflects negative price and sales volume variances of approximately equal magnitudes. Comparing the interim periods lower total net sales value was driven entirely by a negative price variance, which was, to a limited degree, partially offset by a smaller positive sales volume variance.

[13] Conference transcript, pp. 19-20 (McAlear). Petitioners' postconference brief, p. 7. Notwithstanding the segment/industry served by a customer, the ultimate application determines the overhead door spring purchased by the customer. Conference transcript, pp. 58-59 (Boldenow).

[14] For example, while *** indicated that it did not consider its underlying product mix to be different from that of the other U.S. producers, the company stated ***. Email with attachments from ***, November 22, 2024.

[15] It should be noted that, while figure VI-1 indicates that *** accounted for the majority of the U.S. industry's total net sales quantity in 2023, *** (see table F-1). As noted at the beginning of this section of the report and in addition to underlying product mix, U.S. producers have somewhat different business models in terms of channels of distribution.

[16] Conference transcript, p. 59 (Boldenow, McAlear), p. 59-60 (Bianco).

Cost of goods sold and gross profit or loss

Steel wire, the primary variable cost, plays an important role in determining the level of overhead door springs COGS.[17] [18] While U.S. producers indicated that the manufacturing process is capital intensive,[19] they also noted that fixed costs in general are not a large share of total COGS.[20]

*** of the U.S. producers whose financial results are presented in this report, purchased inputs from related suppliers.[21]

Raw material costs

Total raw material cost (primarily steel wire but inclusive of other inputs as well) is the largest component of COGS, ranging from *** percent of COGS (January-June 2024) to *** percent (2022). In terms of the non-steel wire component of raw material costs, *** identified the following items: ***.[22] Aluminum cones, a component of other raw material costs, are often but not always included in overhead door spring sales.[23]

The U.S. industry's average per pound raw material cost increased to its highest level in 2022, declined in 2023, and was lower in January-June 2024 compared to January-June 2023. On a company-specific basis *** U.S. producers reported the above-noted pattern. With regard to the pattern of average per pound raw material costs in general, U.S. producers reportedly

[17] Conference transcript, p. 63 (McAlear).

[18] In addition to steps associated with primary manufacturing, COGS includes costs associated with secondary activity such as coating. Conference transcript, p. 42 (Bianco). Standard coating appears to be largely performed by the U.S. producers themselves, while additional types of coating and/or surface treatment, which appear to represent a small share of sales overall, reflect a mix of in-house and outsourced activity. Conference transcript, p. 65 (Boldenow, McAlear, Bianco).

[19] As described by an Iowa Spring company official, "We look at it {the manufacturing process} as a strong barrier to entry, because it is capital intensive. And then there's also the technological piece too. There's institutional knowledge that is garnered over years and years of practice." Conference transcript, p. 63 (Bianco).

[20] Conference transcript, p. 63 (Boldenow, Bianco, McAlear).

[21] IDC Spring, Iowa Spring, Service Spring U.S. producer questionnaires, section III-6.

[22] *** U.S. producer questionnaire, section III-9c (note 1). U.S. producers reported *** steel wire and other raw material cost shares: *** (steel wire (*** percent of total raw material cost), other raw materials (*** percent)); *** (steel wire (*** percent), other raw materials (*** percent)); Service Spring (steel wire (*** percent), other raw materials (*** percent)). IDC Spring, Iowa Spring, Service Spring U.S. producer questionnaires, section III-9c.

[23] Conference transcript, p. 38 (McAlear), p. 38-39 (Bianco). Sales are made without cones as well but appear to be less prevalent as compared to sales with cones.

experienced raw material supply disruptions in 2021, which were resolved by the second half of 2022.[24]

Direct labor cost and other factory costs

Direct labor cost and other factory costs are the smallest and second largest components of COGS, respectively: direct labor cost ranging from *** percent of COGS (2021) to *** percent (January-June 2024); other factory costs ranging from *** percent of COGS (2022) to *** percent (January-June 2024). As noted above and while U.S. producers consider the manufacturing process to be capital intensive, variable costs associated with raw materials, specifically the steel wire component, account for a large share of COGS, which generally explains the relatively small share of other factory costs.

In order to mitigate differences in company-specific cost assignment of direct labor cost and other factory costs by the responding U.S. producers, conversion costs (the sum of direct labor cost and other factory costs) are referenced for the remainder of this section. The U.S. industry's average per pound conversion costs increased most notably in 2022, followed by smaller increases in 2023 and between the interim periods. U.S. producers indicated that essentially all costs increased during the period. For example and as described by an IDC Spring company official, "For us, notwithstanding the raw material input, literally every other input of cost of production has increased over the last several years. Energy, labor, employee benefits, commercial property liability insurance, consumables, torch tips, forklift, repairs."[25]

On a company-specific basis U.S. producers were directionally uniform in 2022 (reporting higher average per pound conversion costs) but diverged in 2023 and in January-June 2024 compared to January-June 2023. As shown in table F-1, *** U.S. producers ended the period with higher average per pound conversion costs as compared to the beginning.[26]

COGS and gross profit or loss

Reflecting the importance of raw material costs (primarily steel wire) in determining the level of overall COGS, company-specific average per pound COGS were for the most part directionally uniform throughout the period (increasing in 2022, declining in 2023, and lower

[24] Conference transcript, p. 11 (Boldenow).

[25] Conference transcript, p. 62 (Boldenow).

[26] While fixed costs themselves are reportedly not a large part of overall COGS, the level of the U.S. industry's fixed cost absorption during the period was reduced in conjunction with lower capacity utilization. Petitioners' postconference brief (exh. 1, p. 10). All things being equal, reduced fixed cost absorption would in turn yield higher average per pound conversion costs, specifically the other factory costs component.

between the interim periods). The exception was ***, which reported modestly higher average per pound COGS in January-June 2024 compared to January-June 2023.[27] Following the same directional pattern as total net sales value, the U.S. industry's total COGS increased in 2022, decreased in 2023, and was lower in January-June 2024 compared to January-June 2023. Individual U.S. producers followed this pattern during the full-year period but diverged between the interim periods: *** reporting lower total COGS, in conjunction with lower sales quantity, in January-June 2024 compared to January-June 2023; *** reporting higher total COGS, in conjunction with higher sales quantity (see footnote 12).

During the full-year period the U.S. industry's total gross profit and gross profit ratio (total gross profit divided by total net sales value) expanded in 2022 (reflecting an increase in total net sales value that outpaced the increase in total COGS) and contracted in 2023 (reflecting a decline in total net sales value that outpaced the decline in total COGS).[28] Overall and company-specific gross profit and gross profit ratios were also lower in January-June 2024 compared to January-June 2023; the source of company-specific contractions in gross profit ratio reflects either lower net sales values that were only partially offset by lower COGS (***) or lower net sales value and higher COGS (***). As noted previously, *** U.S. producer that reported higher net sales quantity between the interim periods (see footnote 12).

SG&A expenses and operating income or loss

The U.S. industry's total SG&A expenses increased to their highest level in 2022, declined in 2023, and were higher in January-June 2024 compared to January-June 2023. In conjunction with fluctuations in total net sales value, the U.S. industry's SG&A expense ratio (total SG&A expenses divided by total net sales value) declined modestly in 2022 and subsequently increased, reaching its highest level of the period in January-June 2024.

[27] As shown in table F-1, *** average per pound raw material costs were lower in January-June 2024 compared to January-June 2025, like the other U.S. producers, but its average per pound conversion costs, principally the other factory cost component, was higher by a relatively large amount. ***. *** U.S. producer questionnaire, section III-10a-b.

[28] On a company-specific basis ***; its total net sales value and COGS both declined at the same percentage rate in 2023, thereby preserving the gross profit ratio reported in 2022.

Table F-1 shows that company-specific SG&A expense ratios cover a relatively wide range, reflecting, at least in part, differences in underlying business models; e.g., Service Spring, ***, operates a network of distribution centers whereas IDC Spring and Iowa Spring do not.[29] *** U.S. producers reported that their overhead door spring sales and marketing are managed by internal sales staff.[30]

While corresponding changes in SG&A expenses, notably between the interim periods, were a factor, the U.S. industry's operating results were largely determined at the gross level.[31] Directionally, most U.S. producers followed the same overall pattern of operating results (increasing in 2022, declining in 2023, and lower in January-June 2024 compared to January-June 2023). While U.S. producers *** reported lower operating results between the interim periods, *** U.S. producer to report an operating loss.

Interest expense, all other expenses, all other income and net income or loss

The U.S. industry's operating income and net income shared the same directional pattern throughout the period (both increasing in 2022, declining in 2023, and lower in January-June 2024 compared to January-June 2023). As compared to operating income, the level of net income reflects interest expense and other expenses, varying in terms of their relative importance during the period and the extent to which they were partially (2022, 2023, and the interim periods) or entirely (2021) offset by other income.[32]

Capital expenditures, R&D expenses, total net assets and ROA

Table VI-4 presents the U.S. industry's total capital expenditures, R&D expenses, net assets, and ROA related to operations on overhead door springs.[33] Appendix F presents

[29] Conference transcript, p. 66 (McAlear).

[30] Email with attachments from ***, November 22, 2024.

[31] While the full-year period appears to reflect some degree of operating leverage with respect to SG&A expenses (i.e., SG&A expenses increasing and declining at slower percentage rates than corresponding changes in net sales value), U.S. producers indicated that recent SG&A expenses have increased regardless of the directional pattern of net sales value. Conference transcript, p. 64 (McAlear, Bianco, Boldenow).

[32] The large level of other income in 2021 primarily reflects *** and to a lesser extent ***. ***. *** U.S. producer questionnaire, section III-10a-b.

[33] ROA is calculated here as operating results divided by total assets. With regard to a company's overall operations, staff notes that a total asset value (i.e., the bottom line value on the asset side of a company's balance sheet) reflects an aggregation of a number of current and non-current assets, which,

(*continued*...)

company-specific data for the above-noted items, as well as corresponding narrative regarding the nature, focus, and significance of capital expenditures, R&D expenses, and any notable changes in net asset levels.

Table VI-4
Overhead door springs: U.S. producers' capital expenditures, R&D expenses, total net assets, and ROA, by item and period

Value in 1,000 dollars; ratios in percent

Firm	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Capital expenditures	Value	***	***	***	***	***
R&D expenses	Value	***	***	***	***	***
Total net assets	Value	***	***	***	NA	NA
ROA	Ratio	***	***	***	NA	NA

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

As described by U.S. producers, capital expenditures during the period focused on various objectives including capacity expansion and equipment upgrades (see table F-3). *** accounted for the majority of the U.S. industry's capital expenditures (*** percent on a cumulative basis).

U.S. producers reported both recurring (***) and one-time (***) R&D expenses. U.S. producers described focusing R&D activity on objectives such as production and efficiency improvements, in some instances in conjunction with specific equipment (see table F-5). As with capital expenditures, *** accounted for the majority of the U.S. industry's R&D expenses (*** percent on a cumulative basis).

As shown in table VI-4 the U.S. industry's total net assets increased during the period. With respect to changes in total assets in general, U.S. producers noted capital projects related to capacity expansion and facility upgrades (see table F-8).

Capital and investment

The Commission requested U.S. producers of overhead door springs to describe any actual or potential negative effects of imports of overhead door springs from China and India on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-5 presents the number of firms reporting an impact in each category. Table VI-6 presents the U.S. producers' narrative descriptions.

in many instances, are not product specific. The ability of the U.S. producer to assign total asset values to a discrete product line affects the meaningfulness of calculated operating return on net assets.

Table VI-5
Overhead door springs: 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	1
Denial or rejection of investment proposal	Investment	0
Reduction in the size of capital investments	Investment	2
Return on specific investments negatively impacted	Investment	2
Other investment effects	Investment	1
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	1
Other growth and development effects	Growth	2
Any negative effects on growth and development	Growth	3
Anticipated negative effects of imports	Future	3

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

Table VI-6
Overhead door springs: 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 accompanying narrative response
Cancellation, postponement, or rejection of expansion projects	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Other (effects of imports on investment)	***

Table continued.

Table VI-6 Continued
Overhead door springs: 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 accompanying narrative response
Ability to service debt	***
Other (effects of imports on growth and development)	***
Other (effects of imports on growth and development)	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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

Part VII: Threat considerations and information on nonsubject countries

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

> *In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors*[1]*--*
>
> *(I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
>
> *(II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
>
> *(III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
>
> *(IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
>
> *(V) inventories of the subject merchandise,*

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

(VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,

(VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),

(VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and

(IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).[2]

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

[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."

Subject countries

The Commission issued foreign producers' or exporters' questionnaires to 73 firms believed to produce and/or export overhead door springs from China and India.[3] Usable responses to the Commission's questionnaire were received from two firms in total.

The responding producer/exporter in China accounted for *** percent of U.S. imports of overhead door springs from China in 2023 while the responding producer/exporter in India accounted for *** of U.S. imports from India in 2023.[4] Additionally, the responding producer/exporter from China estimated that it accounted for *** percent of overall production of overhead door springs in China in 2023, and the responding producer/exporter from India estimated that they accounted for *** percent of production of in India in 2023.[5]

Table VII-1 presents information on the overhead door springs operations of the responding producers and exports in China and India (or the responding subject producers/exporters, by firm).

Table VII-1
Overhead door springs: Summary data on responding subject foreign producers in 2023, by firm

Producer (and subject foreign industry)	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
China: MFG Direct (Ningbo)	***	***	***	***	***	***
India: Alcomex Springs	***	***	***	***	***	***
All individual producers	***	100.0	***	100.0	***	***

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. Additionally, seven firms submitted a response certifying that they had not produced or exported overhead door springs from China or India since January 1, 2021.

[4] The coverage estimate of imports from China was calculated using data from MFG Direct (Ningbo) Limited's ("MFG Direct (Ningbo)") questionnaire response to the Commission and form information submitted in exhibit GEN-5 of the petition. The coverage estimate of imports from India was calculated using data from Alcomex Springs Pvt. Ltd.'s ("Alcomex Springs") questionnaire response and official Commerce statistics for HTS subheadings 7320.20.5025, 7320.20.5045, and 7320.205060.

[5] Email with ***, November 20, 2024. Foreign producer/exporter questionnaire, section II-7a.

Table VII-2 presents events in the subject countries' industries since January 1, 2021.

Table VII-2
Overhead door springs: Important industry events in the subject foreign industry since 2021

Item	Firm: Event
Capacity expansion	India: Alcomex Springs: Second-quarter 2023— Alcomex Springs Group invested €1.9 million ($2.0 million) to upgrade and expand the manufacturing facility (including a new production line) and expand the warehouse at its facility in Pune, Maharashtra State. The additional production line includes new coiling, shaping, and assembly equipment. There are also additional finishing lines for shot peening, painting, powder coating, printing, and waxing. These investments are anticipated to more than double the production capacity of this facility, specifically "opening the way for a successful entry in the North American market," according to the group's managing directors.
New market entrant	India: Balaji Springs: April 2024— Balaji Springs announced plans to "introduce the most robust torsion springs to the American market."

Source: Alcomex Springs, "Manufacturing Expansion in Alcomex India Will Also Supply the US Door Spring Market," March 21, 2023, https://www.alcomex.com/alcomex-india-will-supply-in-the-us; Alcomex Springs, "Alcomex India: A 15-Year Journey with Continuous Improvement," November 16, 2022, https://www.alcomex.com/15-years-alcomex-india; Petitioners' postconference brief, pp. 45–48, exh. 5: Declaration of Tim Bianco, para. 10; exh. 8: Manufacturing Expansion in Alcomex India Will Also Supply the US Door Spring Market.

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of overhead door springs since 2021. One producer indicated in their questionnaire that they had experienced such changes. Table VII-3 presents the changes identified by these producers.

Table VII-3
Overhead door springs: Reported changes in operations in the subject countries since January 1, 2021, by change, subject industry, and firm

Item	Firm: narrative response regarding changes in operations
Expansions	***

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

Responding subject producers ***.

Installed and practical overall capacity

Table VII-4 presents data on subject producers' installed capacity, practical overall capacity, and practical overhead door springs capacity and production on the same equipment.[6]

Table VII-4
Overhead door springs: Subject producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and utilization in 1,000 pounds; utilization in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical overhead door springs	Capacity	***	***	***	***	***
Practical overhead door springs	Production	***	***	***	***	***
Practical overhead door springs	Utilization	***	***	***	***	***

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

Note: As shown in table VII-1, the *** of these data relate to India.

Installed overall capacity *** from 2021 to 2023, but in January-June 2024 was *** as January-June 2023.[7] Production initially decreased from 2021 to 2022 by *** percent, and rose by *** percent from 2022 to 2023, resulting in a 2021-23 decrease of *** percent. In the January-June 2024 interim period production was *** percent higher than in January-June 2023. Installed overall capacity utilization declined by *** percentage points from 2021 to 2023, reflected in installed capacity *** while production declined. The higher production levels reported across the two interim periods was

[6] Trends in capacity and production reported by responding subject producers reflect the fact that *** accounted for the *** of capacity and production in all periods reported. Commission staff sent questionnaires to the largest producers/exporters or overhead door springs identified in the petition, but did not receive responses.

[7] ***. ***'s foreign producer questionnaire, section II-9.

outpaced by the higher capacity levels, resulting in January-June 2024 capacity utilization being *** percentage points lower than in January-June 2023.

Practical capacity fluctuated but remained *** during 2021-23, and as with installed capacity was *** in January-June 2024 relative to January-June 2023. The 2021-23 net decline in production was reflected in practical capacity utilization, which declined by *** percentage points over the same period. Practical capacity utilization was lowest in January-June 2024, *** percentage points lower than in January-June 2023. Responding subject producers ***.

Constraints on capacity

Tables VII-5 and VII-6 presents subject producers' reported production and capacity constraints since January 1, 2021.

Table VII-5
Overhead door springs: Production constraints by producers in the subject foreign industry

Count in number of firms reporting

Item	China	India	All subject foreign sources
Production bottlenecks	***	***	***
Existing labor force	***	***	***
Supply of material inputs	***	***	***
Fuel or energy	***	***	***
Storage capacity	***	***	***
Logistics/transportation	***	***	***
Other constraints	***	***	***

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

Table VII-6
Overhead door springs: Subject producers' reported constraints to practical overall capacity since January 1, 2021, by constraint and firm

Item	Firm: narrative response on constraints to practical overall capacity
Production bottlenecks	***
Supply of material inputs	***

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

Operations on overhead door springs

Aggregate overhead door springs operations in the subject foreign industries

Table VII-7 presents information on the overhead door springs operations of the responding producers/exporters.

Table VII-7
Overhead door springs: Data on industry in the subject foreign industries, by item and period

Quantity in 1,000 pounds

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

Table VII-7 Continued
Overhead door springs: Data on industry in the subject foreign industries, by period

Ratio and share in percent

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
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.

Note: As shown in table VII-1, the *** of these data relate to India. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

The aggregate capacity of the responding subject producers *** while production decreased by *** percent during 2021-23. Both capacity and production were higher in January-June 2024 relative to January-June 2023, with capacity *** percent higher and production *** percent higher in the second of the two interim periods. In 2024, subject producers project a *** percent increase in capacity compared to 2023, and a *** percent increase in production, with a further *** percent and *** percent increase, respectively, projected from 2024 to 2025. Subject producers' capacity utilization was highest in 2021, decreased in 2022, and increased during 2022-23 for a net decline of *** percentage points from 2021 to 2023. It was *** percentage points lower in January-June 2024 than in January-June 2023. Both capacity and production are projected to increase from 2024 to 2025. Capacity utilization is also expected to increase from 2024 to 2025.

The two responding producers reported a decline of *** percent in total shipments of overhead door springs during 2021-23. In January-June 2024, total shipments were ***

percent higher than in January-June 2023, and in 2024 are projected to be *** percent higher than in 2023, and are projected to further increase by *** percent from 2024 to 2025. The trends in total shipments reflect those of export shipments, which accounted for *** of the total shipments of overhead door springs by the responding subject producers in all periods requested. Exports to all other markets declined overall during 2021-23, as exports to the United States increased during 2021-22 and decreased during 2022-23, for a net increase of ***. Exports to all other markets nonetheless comprised the *** of all exports during 2021-23. Exports to the United States increased from *** pounds in January-June 2023 to *** pounds in January-June 2024, are projected to be *** higher in 2024 relative to 2023, and then continue to increase from 2024 to 2025. Although exports to all other markets are projected to increase during 2024-25, exports to the United States are projected to account for the majority of exports in 2025.[8] Commercial home market shipments by *** comprised *** home market shipments by responding subject producers' in all periods requested.

Practical overhead door springs capacity and production by subject foreign industry

Table VII-8 presents information on subject producers' production, capacity, and capacity utilization by subject country. MFG Direct (Ningbo)'s practical overhead door springs capacity peaked in 2022 and decreased from 2022 to 2023, for a net decrease of *** percent over the 2021-23 period. It was *** percent higher in January-June 2024 relative to January-June 2023, and is projected to decline by *** precent in 2025 compared to 2024.[9] Alcomex Springs' capacity *** during 2021-23, was *** in January-June 2024 relative to January-June 2023, and is projected to further increase by *** percent in 2025 relative to 2024, representing a capacity *** as during 2021-23. While MFG Direct (Ningbo) reported operating ***, Alcomex Springs reported a net decline of *** percentage points in capacity utilization from 2021 to 2023, during which time production levels also decreased overall by *** percent. However, Alcomex Springs' production of overhead door springs in January-June 2024 was *** percent higher than in January-June 2023, and is projected to be *** percent higher in 2025 relative to 2024. Although Alcomex Springs' capacity utilization was *** percentage points lower in

[8] This is due to *** projecting *** pounds of exports to the United States in 2025, compare to *** pounds in 2024, coinciding with ***. ***'s foreign producer questionnaire, section II-9.

[9] MFG Direct (Ningbo) cited a ***. Email with ***, November 20, 2024.

January-June 2024 relative to January-June 2023, the projected increase in capacity during 2024-25 reflects a projected increase of *** percentage points in capacity utilization over the same period.

Table VII-8
Overhead door springs: Subject producers' output: Practical capacity, by source and period

Practical capacity

Capacity in 1,000 pounds

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-8 Continued
Overhead door springs: Subject producers' output: Production, by source and period

Production

Production in 1,000 pounds

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-8 Continued
Overhead door springs: Subject producers' output: Capacity utilization, by source and period

Capacity utilization

Capacity utilization in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Note: Capacity utilization ratio represents the ratio of the subject producer's production to its production capacity.

Table VII-8 Continued
Overhead door springs: Subject producers' output: Share of production, by source and period

Share of production

Share in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	100.0	100.0	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 "---".

Overhead door springs exports, by subject country

Table VII-9 presents information on subject producers' exports of overhead door springs by subject country. MFG Direct (Ningbo) reported exports of overhead door springs to the United States ***. Its exports to the United States peaked in 2022 and then decreased from 2022 to 2023 for a net decrease of *** percent during 2021-23. Its exports to the United States were *** percent higher in January-June 2024 relative to January-June 2023. Alcomex Springs' exports from India to the United States ***, and after decreasing by *** percent from 2022 to 2023, were *** pounds higher in January-June 2024 compared to January-June 2023.[10] While MFG Direct (Ningbo) projects a decrease of *** percent in exports during 2024-2025, Alcomex Springs projects that exports to the United States in 2025 will be ***. MFG Direct (Ningbo) reported that *** of its overhead door springs were exported in all periods requested, while Alcomex Springs reported that *** of its shipments of overhead door springs were exported in all periods requested.

Exports to the United States comprised a steadily decreasing share of MFG Direct (Ningbo)'s total shipments during 2021-23, and beginning in interim January-June 2024 are projected to comprise *** of the firm's shipments in 2024 and 2025. Alcomex Springs' exports to the United States as a share of total shipments fluctuated but ended in 2023 at *** percent, and were *** percentage points higher in January-June 2024 relative to January-

[10] As noted earlier, Alcomex Springs ***. Alcomex Springs' foreign producer questionnaire, section II-9.

June 2023. Alcomex Springs projects that exports to the United States will increase by *** percentage points during 2024-25, ending 2025 at *** of their total shipments.

Table VII-9
Overhead door springs: Subject producers' exports: Exports to the United States, by source and period

Exports to the United States

Quantity in 1,000 pounds

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-9 Continued
Overhead door springs: Subject producers' exports: Share of total shipments exported to the United States, by source and period

Share of total shipments exported to the United States

Share in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-9 Continued
Overhead door springs: Subject producers' exports: Exports to all destination markets, by source and period

Total exports

Quantity in 1,000 pounds

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-9 Continued
Overhead door springs: Subject producers' exports: Share of total shipments exported to all destination markets, by source and period

Share of total shipments exported

Share in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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 "---".

Overhead door springs inventories, by subject foreign industry

Table VII-10 presents information on subject producers' inventories of overhead door springs by subject country. ***, reported inventories of overhead door springs in all periods requested, which fluctuated but never exceeded *** percent as a ratio to total shipments exported in any period requested. *** inventories of overhead door springs.

Table VII-10
Overhead door springs: Subject foreign industries' ending inventories: Ending inventories, by subject foreign industry and period

Quantity in 1,000 pounds

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-10 Continued
Overhead door springs: Subject foreign industries' ending inventories: Ratio of ending inventories to total shipments exported, by subject foreign industry and period

Ratio in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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 "---".

Alternative products

The responding producers in China and India did not report any production of alternative products using the same equipment and/or labor as those used to produce overhead door springs during the period for which data for collected.

Exports

Table VII-11 presents Global Trade Atlas ("GTA") data for exports of helical springs, of iron or steel, ("helical springs") from subject countries to the United States and to all destination markets. Both China's and India's exports of helical springs to the United States peaked in 2022, with China's exports then declining for a 2021-23 net decrease of 2.5 percent, and India's exports to the United States declining from 2022 to 2023 for an over 20-fold 2021-23 net increase. While India's exports to all other destination markets steadily decreased by 6.4 percent from 2021 to 2023, China's exports initially decreased by 6.8 percent during 2021-22, then increased for a net 2021-23 rise of 10.9 percent. Exports from China to the United States as a share of exports to all destinations increased from 2021 to 2022, then decreased from 2022 to 2023, for a net decline of 1.8 percentage points during 2021-23, while exports from India as a share of exports to all destinations peaked in 2022 and then declined from 2022 to 2023 for a net 2021-23 increase of 8.7 percentage points. Exports to the United States from both subject countries in aggregate as a share of total exports of helical springs peaked in 2022 and decreased from 2022 to 2023 for a 2021-23 net decline of by 1.0 percentage point, reflected in the relatively larger decline in exports of helical springs from China to the United States from 2021 to 2023.

Table VII-11
Helical springs, of iron or steel: Global exports from subject foreign industries: Exports to the United States, by subject foreign country and period

Quantity in 1,000 pounds

Exporter	Measure	2021	2022	2023
China	Quantity	32,625	38,224	31,814
India	Quantity	53	1,648	1,334
Subject exporters	Quantity	32,679	39,872	33,148

Table continued.

Table VII-11 Continued
Helical springs, of iron or steel: Global exports from subject foreign industries: Exports to all destination markets, by subject foreign country and period

Quantity in 1,000 pounds

Exporter	Measure	2021	2022	2023
China	Quantity	223,389	208,106	247,710
India	Quantity	15,758	15,467	14,750
Subject exporters	Quantity	239,147	223,573	262,461

Table continued.

Table VII-11 Continued
Helical springs, of iron or steel: Global exports from subject foreign country: Share of exports exported to the United States, by subject foreign country and period

Share in percent

Exporter	Measure	2021	2022	2023
China	Share	14.6	18.4	12.8
India	Share	0.3	10.7	9.0
Subject exporters	Share	13.7	17.8	12.6

Source: Source: Official exports statistics under HS subheading 7320.20 as reported by China Customs and India's Ministry of Commerce in the Global Trade Atlas Suite database, accessed November 5, 2024.

Note: HS subheading 7320.20 includes out of scope products and therefore data are likely overstated. Shares represent the shares of value exported to the United States out of all destination markets.

U.S. inventories of imported merchandise

Table VII-12 presents data on U.S. importers' reported inventories of overhead door springs.

Table VII-12
Overhead door springs: U.S. importers' inventories and their ratio to select items, by source and period

Quantity in 1,000 pounds; ratio in percent

Measure	Source	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
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	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject sources	---	---	---	---	---
Ratio to imports	Nonsubject sources	---	---	---	---	---
Ratio to U.S. shipments of imports	Nonsubject sources	---	---	---	---	---
Ratio to total shipments of imports	Nonsubject sources	---	---	---	---	---
Inventories quantity	All imports	***	***	***	***	***
Ratio to imports	All imports	***	***	***	***	***
Ratio to U.S. shipments of imports	All imports	***	***	***	***	***
Ratio to total shipments of imports	All imports	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Inventories of overhead door springs from China increased by over *** during 2021-22 and declined by *** percent during 2022-23, resulting in a *** 2021-23 net increase. All firms which reported inventories from China in 2021 reported an increase in 2022, and six firms reported inventories in 2022 which did not report inventories in 2021. *** comprised the majority of the 2021-22 increase, reporting approximately *** and *** pounds, respectively, of inventory in 2022. *** also accounted for the large majority of the 2022-23 decrease in inventories from China.[11] Importers' inventories from China were *** percent lower in January-June 2024 compared to January-June 2023. As a ratio to imports from China, inventories initially decreased by *** percentage points during 2021-22, then increased for a *** percentage point increase from 2021 to 2023, and were *** percentage points lower in January-June 2024 relative to January-June 2023. As a ratio to U.S. shipments and total shipments of imports, inventories from China steadily declined from 2021 to 2023, and were *** in January 2024 compared to January 2023.

Only *** reported inventories from India in any period, with *** accounting for *** such inventories in 2022, and *** accounting for *** such inventories in 2023 and January-June 2024. As a ratio to imports from India, inventories *** from 2022 to 2023, and in January-June 2024 were at *** percent. As a ratio to U.S. shipments of imports and total imports, inventories from India increased by *** percentage points during 2022-23, and were highest in January-June 2024, when *** reported *** pounds of inventory and both U.S. and total shipments were at their second-lowest of any period reported.

With no reported inventories from nonsubject sources, total inventories peaked in 2022 and increased overall by *** during 2021-23, after rising to *** pounds in 2022. Total inventories were highest in January-June 2024, reflected in the *** pounds of inventory reported by ***. Total inventories as a ratio to imports decreased by *** percentage points during 2021-22, and increased in 2023 for a 2021-23 net decline of *** percentage points, and was *** percentage points lower in January-June 2024 compared to January-June 2023. Inventories as a ratio to U.S. shipments

[11] ***. ***'s U.S. importer questionnaire, II-2b.

and total shipments of imports declined by *** percentage points during 2021-23. Both measures were *** higher in January-June 2024 relative to January-June 2023.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of overhead door springs from China and India after June 30, 2024. Their reported data are presented in table VII-13. Importers reported arranged imports from China in all periods requested, and from India in three of four periods requested. The majority of arranged imports come from *** in all periods other than April-June 2025. Of the seven firms which reported arranged imports from any source, *** reported the highest levels of arranged imports in all periods reported, with the exception of April-June 2025, when *** did not report arranged imports. ***'s arranged imports were from India, accounting for the vast majority of total arranged imports from India.[12] With the exception of January-March and April-June 2025, *** comprised the *** of arranged imports from China.

Table VII-13
Overhead door springs: U.S. importers' arranged imports, by source and period

Quantity in 1,000 pounds

Source	Jul-Sept 2024	Oct-Dec 2024	Jan-Mar 2025	Apr-Jun 2025	Total
China	***	***	***	***	***
India	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions

According to counsel, the petitioners are not aware of any third-country trade actions or any known trade remedy actions on the subject overhead door springs in third-country markets.[13]

[12] Other than ***, only *** reported arranged imports from India, and only reported such imports in Jul-Sept 2024.

[13] Conference transcript, p. 78 (Cannon).

Information on nonsubject countries

Table VII-14 presents global export data for helical springs of iron or steel, a category that includes subject and out-of-scope products, (by source in descending order of quantity for 2023). During 2023, Germany was the top exporter, accounting for nearly one-fifth (19.0 percent) of the total global export quantity, followed by China (16.4 percent) and Mexico (15.8 percent), which together accounted for over one-half (51.1 percent) of the total. The United States was the fourth largest exporter, accounting for 11.0 percent in that year.

Table VII-14
Helical springs of iron or steel: Global exports by exporter and period

Quantity in 1,000 pounds; Value in 1,000 dollars

Exporting country	Measure	2021	2022	2023
United States	Quantity	157,854	162,614	166,858
China	Quantity	223,389	208,106	247,710
India	Quantity	15,758	15,467	14,750
Subject exporters	Quantity	239,147	223,573	262,461
Germany	Quantity	360,015	303,004	286,678
Mexico	Quantity	479,313	337,880	238,146
Czech Republic	Quantity	81,806	81,335	99,574
Poland	Quantity	93,418	78,931	74,049
Turkey	Quantity	41,288	51,414	49,180
Japan	Quantity	45,972	43,665	39,012
France	Quantity	23,406	24,150	31,369
Hungary	Quantity	28,876	33,729	30,543
Sweden	Quantity	38,613	31,194	27,541
All other exporters	Quantity	257,688	206,201	204,993
All reporting exporters	Quantity	1,847,395	1,577,691	1,510,403
United States	Value	480,929	498,901	517,041
China	Value	386,792	401,634	411,875
India	Value	12,098	13,201	13,604
Subject exporters	Value	398,890	414,835	425,478
Germany	Value	1,020,963	900,427	937,575
Mexico	Value	153,975	177,578	205,116
Czech Republic	Value	168,875	158,443	193,478
Poland	Value	137,928	129,651	144,829
Turkey	Value	37,641	44,507	45,240
Japan	Value	300,939	258,356	228,265
France	Value	83,845	79,153	102,447
Hungary	Value	64,164	66,215	69,761
Sweden	Value	85,175	69,180	68,250
All other exporters	Value	843,606	808,443	843,384
All reporting exporters	Value	3,776,931	3,605,688	3,780,864

Table continued.

Table VII-14 Continued
Helical springs of iron or steel: Global exports by exporter and period

Unit values in dollars per pound; Shares in percent

Exporting country	Measure	2021	2022	2023
United States	Unit value	3.05	3.07	3.10
China	Unit value	1.73	1.93	1.66
India	Unit value	0.77	0.85	0.92
Subject exporters	Unit value	1.67	1.86	1.62
Germany	Unit value	2.84	2.97	3.27
Mexico	Unit value	0.32	0.53	0.86
Czech Republic	Unit value	2.06	1.95	1.94
Poland	Unit value	1.48	1.64	1.96
Turkey	Unit value	0.91	0.87	0.92
Japan	Unit value	6.55	5.92	5.85
France	Unit value	3.58	3.28	3.27
Hungary	Unit value	2.22	1.96	2.28
Sweden	Unit value	2.21	2.22	2.48
All other exporters	Unit value	3.27	3.92	4.11
All reporting exporters	Unit value	2.04	2.29	2.50
United States	Share of quantity	8.5	10.3	11.0
China	Share of quantity	12.1	13.2	16.4
India	Share of quantity	0.9	1.0	1.0
Subject exporters	Share of quantity	12.9	14.2	17.4
Germany	Share of quantity	19.5	19.2	19.0
Mexico	Share of quantity	25.9	21.4	15.8
Czech Republic	Share of quantity	4.4	5.2	6.6
Poland	Share of quantity	5.1	5.0	4.9
Turkey	Share of quantity	2.2	3.3	3.3
Japan	Share of quantity	2.5	2.8	2.6
France	Share of quantity	1.3	1.5	2.1
Hungary	Share of quantity	1.6	2.1	2.0
Sweden	Share of quantity	2.1	2.0	1.8
All other exporters	Share of quantity	13.9	13.1	13.6
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7320.20 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed November 5, 2024.

Note: HS subheading 7320.20 includes out of scope products and therefore data are likely overstated. The United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2023 data.

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
89 FR 87598, November 4, 2024	*Overhead Door Counterbalance Torsion Springs From China and India; Notice of Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-11-04/pdf/2024-25551.pdf
89 FR 92895, November 25, 2024	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China and India: Initiation of Less-Than-Fair-Value Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-11-25/pdf/2024-27495.pdf
89 FR 92901, November 25, 2024	*Overhead Door Counterbalance Torsion Springs From the People's Republic of China and India: Initiation of Countervailing Duty Investigations*	https://www.govinfo.gov/content/pkg/FR-2024-11-25/pdf/2024-27494.pdf

APPENDIX B

LIST OF STAFF CONFERENCE WITNESSES

CALENDAR OF PUBLIC STAFF CONFERENCE

Those listed below appeared as witnesses at the United States International Trade Commission's staff conference:

Subject:	Overhead Door Counterbalance Torsion Springs from China and India
Inv. Nos.:	701-TA-746-747 and 731-TA-1724-1725 (Preliminary)
Date and Time:	November 19, 2024 - 9:30 a.m.

Sessions were held in connection with these preliminary phase investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Imposition (**Kathleen W. Cannon**, Kelley Drye & Warren LLP)

In Support of the Imposition of the Antidumping and Countervailing Duty Orders:

Kelley Drye & Warren LLP
Washington, DC
on behalf of

IDC Group, Inc.
Iowa Spring Manufacturing, Inc.
Service Spring Corp.

Jodi Boldenow, President and Owner, IDC Group, Inc.

Jenny McGrath, Director, Sales and Marketing, IDC Group, Inc.

Tim Bianco, President and Chief Executive Officer, Iowa Spring Manufacturing, Inc.

Brett Damos, Operations Manager, Iowa Spring Manufacturing, Inc.

In Support of the Imposition of the
Antidumping and Countervailing Duty Orders (continued):

Matt McAlear, Chief Executive Officer, Service Spring Corp.

Rankin Walkup, Vice President of Sales, Service Spring Corporation

Brad Hudgens, Senior Trade Analyst, Georgetown Economic Services, LLC

Jacob T. Jones, Trade Analyst, Georgetown Economic Services, LLC

Kathleen W. Cannon)
Elizabeth C. Johnson) – OF COUNSEL
Matthew T. Martin)

CLOSING REMARKS:

In Support of Imposition (**Kathleen W. Cannon**, Kelley Drye & Warren LLP)

APPENDIX C

SUMMARY DATA

Table C-1
Overhead door springs: Summary data concerning the U.S. market, by item and period
Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
Item	2021	2022	2023	2023	2024	2021-23	2021-22	2022-23	2023-24
U.S. consumption quantity:									
Amount	***	***	***	***	***	▼***	▲***	▼***	▲***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▲***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
India	***	***	***	***	***	▲***	▲***	▼***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▼***	▲***
Nonsubject sources	---	---	---	---	---	---	---	---	---
All import sources	***	***	***	***	***	▲***	▲***	▼***	▲***
U.S. consumption value:									
Amount	***	***	***	***	***	▲***	▲***	▼***	▼***
Producers' share (fn1)	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China	***	***	***	***	***	▲***	▲***	▲***	▲***
India	***	***	***	***	***	▲***	▲***	▼***	▲***
Subject sources	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources	---	---	---	---	---	---	---	---	---
All import sources	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. imports from:									
China:									
Quantity	3,454	10,648	11,009	4,112	8,317	▲218.7	▲208.3	▲3.4	▲102.3
Value	5,076	12,504	14,107	5,306	13,078	▲177.9	▲146.3	▲12.8	▲146.5
Unit value	$1.47	$1.17	$1.28	$1.29	$1.57	▼(12.8)	▼(20.1)	▲9.1	▲21.9
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
India									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Nonsubject sources:									
Quantity	---	---	---	---	---	---	---	---	---
Value	---	---	---	---	---	---	---	---	---
Unit value	---	---	---	---	---	---	---	---	---
Ending inventory quantity	---	---	---	---	---	---	---	---	---
All import sources:									
Quantity	***	***	***	***	***	▲***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▲***

Table continued.

Table C-1 Continued
Overhead door springs: Summary data concerning the U.S. market, by item and period
Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted

	Reported data					Period changes			
	Calendar year			Jan-Jun		Comparison years			Jan-Jun
Item	2021	2022	2023	2023	2024	2021-23	2021-22	2022-23	2023-24
U.S. producers':									
Practical capacity quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Production quantity	***	***	***	***	***	▼***	▲***	▼***	▲***
Capacity utilization (fn1)	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. shipments:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Export shipments:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▼***
Value	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Inventories/total shipments (fn1)	***	***	***	***	***	▼***	▼***	▲***	▼***
Production workers	***	***	***	***	***	▲***	▲***	▼***	▲***
Hours worked (1,000 hours)	***	***	***	***	***	▲***	▲***	▼***	▼***
Wages paid (1,000 dollars)	***	***	***	***	***	▲***	▲***	▼***	▲***
Hourly wages (dollars per hour)	***	***	***	***	***	▲***	▲***	▼***	▲***
Productivity (pounds per hour)	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit labor costs	***	***	***	***	***	▲***	▲***	▲***	▲***
Net sales:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▲***
Value	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▼***	▼***
Cost of goods sold (COGS)	***	***	***	***	***	▲***	▲***	▼***	▼***
Gross profit or (loss) (fn2)	***	***	***	***	***	▲***	▲***	▼***	▼***
SG&A expenses	***	***	***	***	***	▲***	▲***	▼***	▲***
Operating income or (loss) (fn2)	***	***	***	***	***	▼***	▲***	▼***	▼***
Net income or (loss) (fn2)	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit COGS	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit SG&A expenses	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2)	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit net income or (loss) (fn2)	***	***	***	***	***	▼***	▲***	▼***	▼***
COGS/sales (fn1)	***	***	***	***	***	▲***	▼***	▲***	▲***
Operating income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
Net income or (loss)/sales (fn1)	***	***	***	***	***	▼***	▲***	▼***	▼***
Capital expenditures	***	***	***	***	***	▲***	▲***	▼***	▼***
Research and development expenses	***	***	***	***	***	▲***	▲***	▲***	▼***
Total assets	***	***	***	***	***	▲***	▲***	▲***	***

Source: Compiled from data submitted in response to Comimission questionnaires for sources other than China and from information submitted as part of the petition for China. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. See Appendix D for a detailed comparision of available import datasets for China in the preliminary phase of these investigations. 508-compliant tables for these data are contained in Parts III, IV, VI, and VII of this report.

Note. For imports from China, "Quantity" data reflect estimates of the volume of U.S. imports of overhead door springs included in the petition; "Unit value" data reflect average unit values for U.S. imports for consumption under HTS statistical reporting number 7320.20.5045; "Value" data reflect the product (i.e. multiplication) of "Quantity" and "Unit value" for each period. 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

COMPARISON OF U.S. IMPORTS FROM CHINA

Table D-1
Overhead door springs: U.S. imports from China, by data source and by period

Quantity in 1,000 pounds

Data Source	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Questionnaire primary HTS numbers	***	***	***	***	***
Difference: Petition estimate vs. USITC questionnaires	***	***	***	***	***
Petition estimated import volumes, exhibit 5	3,454	10,648	11,009	4,112	8,317
Difference: Adjusted official statistics vs. petition estimate	***	***	***	***	***
Adjusted official U.S. import statistics	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaire, official U.S. imports statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 7320.20.5045, accessed November 12, 2024 adjusted to remove out-of-scope imports reported in Commission questionnaires responses and using proprietary, Census-edited Customs records using HTS statistical reporting numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060, accessed October 30, 2024 for certified "No" import submissions, and from information submitted as part of the petition. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. Adjusted official U.S. imports are based on the imports for consumption data series, and value data reflect landed, duty-paid values.

Table D-2
Overhead door springs: U.S. imports from China, by period

Ratios in percent

Ratio Explanation	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Questionnaire data for the primary HTS numbers, relative to the petitioner's estimated import volumes from China	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaire and from information submitted as part of the petition. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider.

Table D-3
Overhead door springs: U.S. imports from China, by period

Ratios in percent

Ratio Explanation	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Petitioner's estimated import volumes from China, relative to adjusted official statistics	***	***	***	***	***

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce Census Bureau using HTS statistical reporting number 7320.20.5045, accessed November 12, 2024 adjusted to remove out-of-scope imports reported in Commission questionnaires responses and using proprietary, Census-edited Customs records using HTS statistical reporting numbers 7320.20.5020, 7320.20.5045, and 7320.20.5060, accessed October 30, 2024 for certified "No" import submissions and from information submitted as part of the petition. The petition's estimates for China were developed through a review of ocean freight shipment manifests available to the petitioner via a third party service provider. Adjusted official U.S. imports are based on the imports for consumption data series, and value data reflect landed, duty-paid values.

APPENDIX E

U.S. SHIPMENTS BY LEVEL OF ASSEMBLY

Table E-1
Overhead door springs: U.S. producers' U.S. shipments, by level of assembly and by period

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

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Standalone springs	Quantity	***	***	***	***	***
Springs within kits	Quantity	***	***	***	***	***
Springs attached to other goods	Quantity	***	***	***	***	***
All levels of assembly	Quantity	***	***	***	***	***
Standalone springs	Value	***	***	***	***	***
Springs within kits	Value	***	***	***	***	***
Springs attached to other goods	Value	***	***	***	***	***
All levels of assembly	Value	***	***	***	***	***
Standalone springs	Unit value	***	***	***	***	***
Springs within kits	Unit value	***	***	***	***	***
Springs attached to other goods	Unit value	***	***	***	***	***
All levels of assembly	Unit value	***	***	***	***	***
Standalone springs	Share of quantity	***	***	***	***	***
Springs within kits	Share of quantity	***	***	***	***	***
Springs attached to other goods	Share of quantity	***	***	***	***	***
All levels of assembly	Share of quantity	100.0	100.0	100.0	100.0	100.0
Standalone springs	Share of value	***	***	***	***	***
Springs within kits	Share of value	***	***	***	***	***
Springs attached to other goods	Share of value	***	***	***	***	***
All levels of assembly	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
Overhead door springs: U.S. imports from China, by level of assembly and by period

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

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Standalone springs	Quantity	***	***	***	***	***
Springs within kits	Quantity	***	***	***	***	***
Springs attached to other goods	Quantity	***	***	***	***	***
All levels of assembly	Quantity	***	***	***	***	***
Standalone springs	Value	***	***	***	***	***
Springs within kits	Value	***	***	***	***	***
Springs attached to other goods	Value	***	***	***	***	***
All levels of assembly	Value	***	***	***	***	***
Standalone springs	Unit value	***	***	***	***	***
Springs within kits	Unit value	***	***	***	***	***
Springs attached to other goods	Unit value	***	***	***	***	***
All levels of assembly	Unit value	***	***	***	***	***
Standalone springs	Share of quantity	***	***	***	***	***
Springs within kits	Share of quantity	***	***	***	***	***
Springs attached to other goods	Share of quantity	***	***	***	***	***
All levels of assembly	Share of quantity	100.0	100.0	100.0	100.0	100.0
Standalone springs	Share of value	***	***	***	***	***
Springs within kits	Share of value	***	***	***	***	***
Springs attached to other goods	Share of value	***	***	***	***	***
All levels of assembly	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
Overhead door springs: U.S. imports from India, by level of assembly and by period

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

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Standalone springs	Quantity	***	***	***	***	***
Springs within kits	Quantity	***	***	***	***	***
Springs attached to other goods	Quantity	***	***	***	***	***
All levels of assembly	Quantity	***	***	***	***	***
Standalone springs	Value	***	***	***	***	***
Springs within kits	Value	***	***	***	***	***
Springs attached to other goods	Value	***	***	***	***	***
All levels of assembly	Value	***	***	***	***	***
Standalone springs	Unit value	***	***	***	***	***
Springs within kits	Unit value	***	***	***	***	***
Springs attached to other goods	Unit value	***	***	***	***	***
All levels of assembly	Unit value	***	***	***	***	***
Standalone springs	Share of quantity	***	***	***	***	***
Springs within kits	Share of quantity	***	***	***	***	***
Springs attached to other goods	Share of quantity	***	***	***	***	***
All levels of assembly	Share of quantity	---	100.0	100.0	---	100.0
Standalone springs	Share of value	***	***	***	***	***
Springs within kits	Share of value	***	***	***	***	***
Springs attached to other goods	Share of value	***	***	***	***	***
All levels of assembly	Share of value	---	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
Overhead door springs: U.S. imports from subject sources, by level of assembly and by period

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

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Standalone springs	Quantity	***	***	***	***	***
Springs within kits	Quantity	***	***	***	***	***
Springs attached to other goods	Quantity	***	***	***	***	***
All levels of assembly	Quantity	***	***	***	***	***
Standalone springs	Value	***	***	***	***	***
Springs within kits	Value	***	***	***	***	***
Springs attached to other goods	Value	***	***	***	***	***
All levels of assembly	Value	***	***	***	***	***
Standalone springs	Unit value	***	***	***	***	***
Springs within kits	Unit value	***	***	***	***	***
Springs attached to other goods	Unit value	***	***	***	***	***
All levels of assembly	Unit value	***	***	***	***	***
Standalone springs	Share of quantity	***	***	***	***	***
Springs within kits	Share of quantity	***	***	***	***	***
Springs attached to other goods	Share of quantity	***	***	***	***	***
All levels of assembly	Share of quantity	100.0	100.0	100.0	100.0	100.0
Standalone springs	Share of value	***	***	***	***	***
Springs within kits	Share of value	***	***	***	***	***
Springs attached to other goods	Share of value	***	***	***	***	***
All levels of assembly	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 “---“.

APPENDIX F

COMPANY-SPECIFIC FINANCIAL DATA

Table F-1
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 pounds

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: 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
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: 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
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: 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
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: 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
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: 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
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: 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
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratio in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratio in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratio in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratio in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratio in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw materials cost

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor cost

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit conversion costs

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table F-1 Continued
Overhead door springs: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit value in dollars per pound

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Conversion costs are the sum of direct labor cost and other factory costs. In order to mitigate differences in company-specific cost assignment of direct labor cost and other factory costs by the responding U.S. producers, conversion costs are presented in this table as supplemental information.

Table F-2
Overhead door springs: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table F-3
Overhead door springs: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
IDC Spring	***
Iowa Spring	***
Service Spring	***

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

Table F-4
Overhead door springs: 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
IDC Spring	***	***	***	***	***
Iowa Spring	***	***	***	***	***
Service Spring	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table F-5
Overhead door springs: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
IDC Spring	***
Iowa Spring	***
Service Spring	***

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

Table F-6
Overhead door springs: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023
IDC Spring	***	***	***
Iowa Spring	***	***	***
Service Spring	***	***	***
All firms	***	***	***

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

Note: ***. Email with attachments from ***, November 22, 2024.

Table F-7
Overhead door springs: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2021	2022	2023
IDC Spring	***	***	***
Iowa Spring	***	***	***
Service Spring	***	***	***
All firms	***	***	***

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

Note: ***. Email with attachments from ***, November 22, 2024.

Table F-8
Overhead door springs: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on total assets
IDC Spring	***
Iowa Spring	***
Service Spring	***

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