

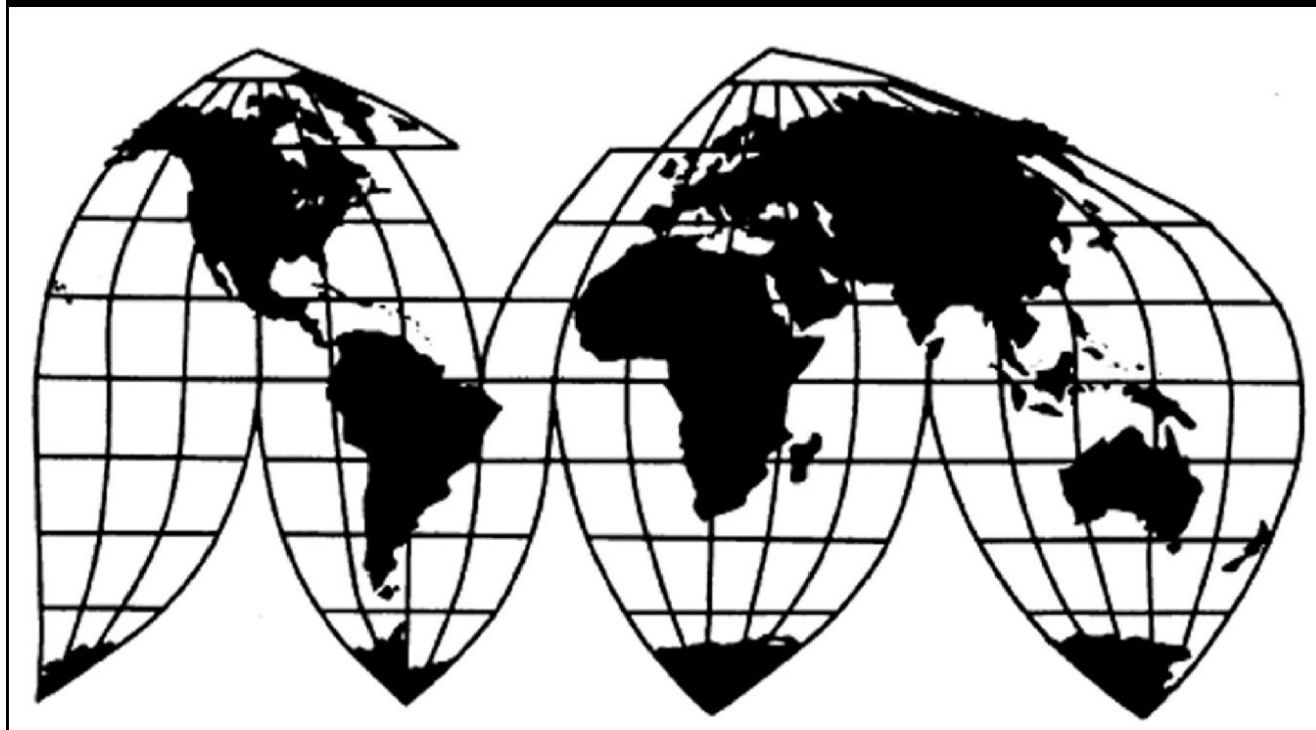
Steel Wire Garment Hangers from China

Investigation No. 731-TA-1123 (Third Review)

Publication 5580

January 2025

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-1123 (Third Review)

Steel Wire Garment Hangers from China

DETERMINATION

On the basis of the record¹ developed in the subject five-year review, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping duty order on steel wire garment hangers from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.²

BACKGROUND

The Commission instituted this review on July 1, 2024 (89 FR 54519) and determined on October 4, 2024, that it would conduct an expedited review (89 FR 89040, November 12, 2024).

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

² Commissioner Schmidlein not participating.

Views of the Commission

Based on the record in this five-year review, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping duty order on steel wire garment (“SWG”) hangers from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.¹

I. Background

Original Investigation. In September 2008, the Commission determined that an industry in the United States was materially injured by reason of imports of SWG hangers from China that were sold at less than fair value (“LTFV”).² The Department of Commerce (“Commerce”) issued an antidumping duty order on imports of SWG hangers from China on October 6, 2008.³

First Review. The Commission instituted the first five-year review of the antidumping duty order on September 3, 2013.⁴ After conducting an expedited review, the Commission made an affirmative determination.⁵ Commerce issued a notice of the continuation of the antidumping duty order on SWG hangers from China on March 11, 2014.⁶

Second Review. The Commission instituted the second five-year review on February 1, 2019.⁷ After conducting an expedited review, the Commission made an affirmative determination.⁸ Commerce issued a notice of the continuation of the antidumping duty order on SWG hangers from China on August 28, 2019.⁹

¹ Commissioner Schmidlein did not participate in this review.

² *Steel Wire Garment Hangers from China*, Inv. No. 731-TA-1123 (Final), USITC Pub. 4034 (Sep. 2008) (“*Original Determination*”).

³ Antidumping Duty Order: Steel Wire Garment Hangers from the People’s Republic of China, 73 Fed. Reg. 58111 (Oct. 6, 2008).

⁴ *Steel Wire Garment Hangers from China*, Inv. No. 731-TA-1123 (Review), USITC Pub. 4453 (Feb. 2014) (“*First Review*”) at 3.

⁵ *First Review*, USITC Pub. 4453 at 3.

⁶ *Steel Wire Garment Hangers from the People’s Republic of China: Continuation of Antidumping Duty Order*, 79 Fed. Reg. 13613 (Mar. 11, 2014).

⁷ *Steel Wire Garment Hangers from China*, Inv. No. 731-TA-1123 (Second Review), USITC Pub. 4945 (Aug. 2019) (“*Second Review*”) at 3.

⁸ *Second Review*, USITC Pub. 4945 at 18.

⁹ *Steel Wire Garment Hangers from the People’s Republic of China: Continuation of Antidumping Duty Order*, 84 Fed. Reg. 45127 (Aug. 28, 2019).

Current Review. On July 1, 2024, the Commission instituted its third five-year review of the antidumping duty order on SWG hangers from China.¹⁰ M&B Metal Products Company, Inc. (“M&B”), a domestic manufacturer of SWG hangers, filed the sole response to the notice of institution.¹¹ No respondent interested party responded to the notice of institution or otherwise participated in this review. On October 4, 2024, the Commission determined that the domestic interested party group response was adequate and that the respondent interested party group response to the notice of institution was inadequate. Finding that no other circumstances warranted conducting a full review, the Commission determined to conduct an expedited review of the order.¹² On December 13, 2024, M&B filed comments regarding the determination the Commission should reach in this expedited review pursuant to 19 C.F.R. § 207.62(d).¹³

In this review, U.S. industry data are based on information submitted by M&B in its response to the notice of institution. M&B estimates that it accounted for *** percent of domestic production of SWG hangers in 2023.¹⁴ U.S. import data and related information are based on Commerce’s official import statistics.¹⁵ Foreign industry data and related information are based on information from the original investigation and prior reviews, as well as information submitted by M&B in this expedited review, and publicly available information, such as Global Trade Atlas (“GTA”) data, gathered by Commission staff. Three U.S. purchasers of SWG hangers responded to the Commission’s adequacy phase questionnaires.¹⁶

¹⁰ *Steel Wire Garment Hangers from the People’s Republic of China: Institution of a Five-Year Review*, 89 Fed. Reg. 54519 (July 1, 2024).

¹¹ M&B Response to the Notice of Institution, EDIS Doc. 827580 (July 30, 2024) (“M&B Response”); M&B Supplement to Domestic Response to Notice of Institution, EDIS Doc. 828716 (Aug. 6, 2024).

¹² *Explanation of Commission Determination on Adequacy*, EDIS Doc. 836223 (Nov. 1, 2024).

¹³ Third Five-Year Review of Steel Wire Garment Hangers from China: Domestic Industry’s Written Comments, EDIS Doc. 832946 (Dec. 13, 2024).

¹⁴ Confidential Report, INV-WW-116 (Sept. 23, 2024) (“CR”); *Steel Wire Garment Hangers from China*, Inv. No. 731-TA-1123 (Third Review), USITC Pub. 5580 (Jan. 2025) (“PR”) at Appendix B, B-3, Table I-2.

¹⁵ CR/PR at I-13 to I-14, Tables I-5 to I-6. The Commission compiled the information contained in these tables using Commerce statistics for Harmonized Tariff Schedule (“HTS”) statistical reporting number 7326.20.0020. *Id.* The data for subject imports may be understated for the 2020-2021 period; U.S. Customs and Border Protection (“CBP”) has determined that imports of Chinese-origin SWG hangers had been transshipped through India in 2020 and through Thailand in 2021. M&B Response at 18 & Ex. 6.

¹⁶ CR/PR at Appendix D, D-3 (responses by ***).

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”¹⁷ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”¹⁸ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.¹⁹

Commerce has defined the imported merchandise within the scope of the order under review as follows:

{S}teel wire garment hangers, fabricated from carbon steel wire, whether or not galvanized or painted, whether or not coated with latex or epoxy or similar gripping materials, and/or whether or not fashioned with paper covers or capes (with or without printing) and/or nonslip features such as saddles or tubes. These products may also be referred to by a commercial designation, such as shirt, suit, strut, caped, or latex (industrial) hangers. Specifically excluded from the scope of the *Order* are wooden, plastic, and other garment hangers that are not made of steel wire. Also excluded from the scope of the *Order* are chrome-plated steel wire garment hangers with a diameter of 3.4 mm or greater. The products subject to the *Order* are currently classified under U.S.

¹⁷ 19 U.S.C. § 1677(4)(A).

¹⁸ 19 U.S.C. § 1677(10); see, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. 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); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); see also S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

¹⁹ See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

Harmonized Tariff Schedule (HTSUS) subheadings 7326.20.0020, 7323.99.9060, and 7323.99.9080.

Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise is dispositive.²⁰

SWG hangers are used by the dry cleaning, industrial laundry, textile, and uniform rental industries. The four most common varieties of dry-cleaning hangers are caped hangers, shirt hangers, suit hangers, and strut hangers.²¹ Despite some differences in finishes and paper accessories, these hangers share the same basic configuration, characteristics, and end uses.²² SWG hangers that are produced for use in industrial laundries or the uniform rental market are known as textile or uniform rental hangers or as industrial hangers. These hangers are produced from heavier gauge wire to support the weight of newly washed textiles and uniforms. Typically, industrial laundries and uniform rental companies require hangers of a more substantial gauge and consistent shape to fit their high-speed processing equipment.²³

²⁰ *Steel Wire Garment Hangers from the People's Republic of China: Final Results of Expedited Third Sunset Review of the Antidumping Duty Order*, 89 Fed. Reg. 88956 (Nov. 12, 2024) (“*Final Results*”) and accompanying *Issues and Decision Memorandum for the Expedited Third Sunset Review of the Antidumping Duty Order on Steel Wire Garment Hangers from the People's Republic of China* (“*Issues and Decision Memorandum*”), A-570-918 (Sunset Review), EDIS Doc. 841370 (Nov. 5, 2024) at 2. The scope is unchanged from that in the first review; the exclusion from the order of chrome-plated steel wire garment hangers with a diameter of 3.4 mm or greater was the result of a changed circumstances review that Commerce conducted between issuance of the order and the first review. *Steel Wire Garment Hangers from the People's Republic of China: Final Results of Changed Circumstances Review, and Revocation in Part of Antidumping Duty Order*, 74 Fed. Reg. 50596 (Oct. 2, 2009). Commerce has issued several scope rulings since the first review. *Issues and Decision Memorandum* at 4 n.16.

²¹ CR/PR at I-6.

²² CR/PR at I-6.

²³ CR/PR at I-7.

1. The Original Investigation

In the original investigation, the Commission found a single domestic like product consisting of SWG hangers, coextensive with Commerce's scope.²⁴ The Commission found that, although there were some differences among the various types of SWG garment hangers, all SWG hangers otherwise shared the same general physical characteristics and uses, were generally sold through the same channels of distribution, and were generally produced using the same production processes and equipment.²⁵

2. First and Second Five-Year Reviews

In the first and second five-year reviews, there was no new information that suggested any reason for the Commission to revisit the domestic like product definition from the original investigation, and the responding domestic interested parties agreed with that definition.²⁶ Thus, the Commission defined the domestic like product to be certain SWG hangers, coextensive with Commerce's amended scope definition.²⁷

3. The Current Review

In the current review, the record contains no information indicating that the pertinent characteristics and uses of domestically produced SWG hangers have changed since the prior proceedings so as to warrant revisiting the Commission's definition of the domestic like product.²⁸ M&B agrees with the domestic like product definition that the Commission adopted in the prior proceedings.²⁹ We therefore define the domestic like product to be SWG hangers, coextensive with Commerce's scope definition.

²⁴ *Original Determination*, USITC Pub. 4034 at 6.

²⁵ The Commission rejected the argument that type-2 vinyl-dipped garment hangers were a separate domestic like product on the basis that these hangers were not domestically produced. It found that the "most similar" product that was produced domestically consisted of SWG hangers. *Id.* at 7.

²⁶ *First Review*, USITC Pub. 4453 at 5; *Second Review*, USITC Pub. 4945 at 6.

²⁷ *First Review*, USITC Pub. 4453 at 5; *Second Review*, USITC Pub. 4945 at 6.

²⁸ *See generally* CR/PR at I-6 to I-9.

²⁹ M&B Response at 18-19.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”³⁰ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In the original investigation, the Commission excluded two domestic producers, Laidlaw and United Wire, from the domestic industry pursuant to the related parties provision.³¹ It found that each firm qualified for possible exclusion under the related parties provision based upon its importation of subject merchandise and determined that appropriate circumstances existed to exclude each firm from the domestic industry on the basis that its primary interests had shifted from domestic production to importation and it had benefitted from its importation of subject merchandise.³² In the first and second reviews, the Commission identified no related party issues and defined the domestic industry to include all domestic producers of SWG hangers.³³

In the current review, M&B agrees with the Commission’s definition of the domestic industry as stated in the Commission’s notice of institution.³⁴ The record does not indicate that there are any related parties or other domestic industry issues in this review.³⁵

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

³¹ Commissioners Williamson and Pinkert did not join in the Commission majority’s analysis regarding Laidlaw and United Wire and included both companies in their definition of the domestic industry. *Original Determination*, USITC Pub. 4034 at 9 n.41.

³² *Original Determination*, USITC Pub. 4034 at 8-13. The Commission found that appropriate circumstances did not exist to exclude *** other parties from the domestic industry as related parties. *Id.* at 9, 13 n.80; Confidential Views of the Commission, EDIS Doc. 826815 (Sep. 2008) at 9, 13 n.80 (“Confidential Original Determination”).

³³ *First Review*, USITC Pub. 4453 at 6; *Second Review*, USITC Pub. 4945 at 7.

³⁴ M&B Response at 18-19.

³⁵ M&B states that it does not import SWG hangers and that it is not affiliated with any importer or exporter of subject merchandise. M&B Response at 11. M&B did not identify any other domestic producers that it believed would qualify for possible exclusion under the related parties provision.

Accordingly, consistent with our definition of the domestic like product, we define the domestic industry to include all domestic producers of SWG hangers.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”³⁶ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”³⁷ Thus, the likelihood standard is prospective in nature.³⁸ The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.³⁹

³⁶ 19 U.S.C. § 1675a(a).

³⁷ SAA at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

³⁸ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

³⁹ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); (Continued...)

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”⁴⁰ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”⁴¹

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated.”⁴² It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).⁴³ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.⁴⁴

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in

(...Continued)

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

⁴⁰ 19 U.S.C. § 1675a(a)(5).

⁴¹ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

⁴² 19 U.S.C. § 1675a(a)(1).

⁴³ 19 U.S.C. § 1675a(a)(1). Commerce has not made any findings regarding duty absorption. *Issues and Decision Memorandum* at 4; see also *Second Review*, USITC Pub. 4945 at 8 n.34 (noting the lack of any duty absorption findings).

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

absolute terms or relative to production or consumption in the United States.⁴⁵ In doing so, the Commission must consider “all relevant economic factors,” including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.⁴⁶

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.⁴⁷

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.⁴⁸ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is

⁴⁵ 19 U.S.C. § 1675a(a)(2).

⁴⁶ 19 U.S.C. § 1675a(a)(2)(A-D).

⁴⁷ See 19 U.S.C. § 1675a(a)(3). The SAA states that “[c]onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

⁴⁸ 19 U.S.C. § 1675a(a)(4).

related to the order under review and whether the industry is vulnerable to material injury upon revocation.⁴⁹

No respondent interested party participated in this expedited review. The record, therefore, contains limited new information with respect to the SWG hanger industry in China. There also is limited information on the SWG hanger market in the United States during the period of review. Accordingly, for our determination, we rely as appropriate on the facts available from the original investigation and prior reviews, and the limited new information on the record in this third five-year review.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁵⁰ The following conditions of competition inform our determinations.

1. Demand Conditions

In the original investigation and prior five-year reviews, the Commission found that SWG hangers were used primarily by the dry cleaning, industrial laundry, textile, and uniform rental industries.⁵¹ In the original investigation, apparent U.S. consumption of SWG hangers rose from 2.9 billion hangers in 2005 to 3.3 billion hangers in 2007.⁵² In the expedited first review,

⁴⁹ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

⁵⁰ 19 U.S.C. § 1675a(a)(4).

⁵¹ *Original Determination*, USITC Pub. 4034 at 14; *First Review*, USITC Pub. 4453 at 10; *Second Review*, USITC Pub. 4945 at 10.

⁵² *Original Determination*, USITC Pub. 4034 at 14 n.89.

apparent U.S. consumption was *** hangers in 2012.⁵³ In the expedited second review, apparent U.S. consumption was *** hangers in 2018.⁵⁴

In the current review, the available information indicates that SWG hangers continue to be used primarily by the dry cleaning, industrial laundry, textile, and uniform rental industries.⁵⁵ M&B asserts that the United States continues to be the only market of significance in the world for SWG hangers.⁵⁶ M&B states that the COVID-19 pandemic and the increase in remote work have reduced the incidence of dry cleaning, which has reduced the number of hangers purchased by the dry-cleaning industry.⁵⁷ M&B also reports that the textile rental business has not been affected and that demand for that end use remains robust.⁵⁸ Responding purchasers ***.⁵⁹ In addition, responding purchaser ***.⁶⁰ Apparent U.S. consumption of SWG hangers was *** in 2023.⁶¹

⁵³ *First Review*, USITC Pub. 4453 at 10; Confidential Views of the Commission (First Review), EDIS Doc. 827112 (Feb. 2014) at 13 (“Confidential First Review”).

⁵⁴ *Second Review*, USITC Pub. 4945 at 10; Confidential Views of the Commission (Second Review), EDIS Doc. 827115 (Aug. 2019) at 14 (“Confidential Second Review”). In the second review, the data regarding apparent domestic consumption for 2018 reflected the domestic shipments of the sole domestic producer that responded to the notice of institution, M&B, and, consequently, were not fully comparable with the data from prior periods in which data from other domestic producers was available and included. Because M&B estimated that it accounted for *** percent of domestic SWG hanger production in 2018, Confidential Second Review at 16 & n.59, the available apparent U.S. consumption figure for 2018 is likely understated.

⁵⁵ CR/PR at I-6.

⁵⁶ M&B Response at 13.

⁵⁷ M&B Response at 16; CR/PR at I-9.

⁵⁸ M&B Response at 16.

⁵⁹ CR/PR at Appendix D, D-3.

⁶⁰ CR/PR at Appendix D, D-3. In its response M&B did not include demand projections regarding future demand. See *generally* M&B Response.

⁶¹ CR/PR at I-14, Table I-6. As in the second review, apparent U.S. consumption for 2023 reflects the U.S. shipments reported by the sole domestic producer that responded to the notice of institution, accounting for an estimated *** percent of domestic SWG hanger production in 2023. Consequently, apparent U.S. consumption in 2023 is likely to be understated relative to apparent U.S. consumption in the original investigation and the first review, which was based on U.S. shipments reported by responding producers accounting for *** percent of domestic production in 2007 and the vast majority of domestic production in 2012. *Id.* at I-8, I-14, Table I-6.

2. Supply Conditions

During the original investigation, the domestic industry's share of the U.S. market declined steadily, from *** percent in 2005 to *** percent in 2007.⁶² The Commission observed that the period of investigation ("POI") was marked by U.S. plant closures and the shuttering of much of the domestic industry's capacity as the volume of subject imports increased.⁶³ Subject imports increased their share of the U.S. market from 36.0 percent in 2005 to 80.9 percent in 2007.⁶⁴ Nonsubject imports' share of the U.S. market declined irregularly from 10.9 percent in 2005 to 10.4 percent in 2007.⁶⁵

In the first five-year review, the domestic interested parties asserted that five domestic producers had entered the U.S. market after the original investigation.⁶⁶ In 2012, the domestic industry's market share – *** percent of apparent U.S. consumption – was higher than that in the original investigation.⁶⁷ In 2012, subject imports accounted for *** percent of apparent U.S. consumption, and nonsubject imports accounted for *** percent.⁶⁸ The Commission observed that in 2012, SWG hangers from Taiwan and Vietnam had become subject to antidumping duty orders and that SWG hangers from Vietnam had become subject to a countervailing duty order.⁶⁹

In the second review, M&B identified three additional domestic producers, but also stated that six domestic producers had ceased operating since the prior review.⁷⁰ In 2018, M&B accounted for *** percent of apparent U.S. consumption,⁷¹ subject imports for ***

⁶² Confidential Original Determination at 18 n.120. The share of apparent U.S. consumption represented by the two producers excluded from the domestic industry (Laidlaw and United Wire) was *** percent in 2005, *** percent in 2006, and *** percent in 2007. *Original Determination*, USITC Pub. 4034 at 18 n.120; Confidential Original Determination at 18 n.120; Confidential Staff Report, Memorandum INV-FF-109, EDIS Doc. 826110 (Aug. 27, 2008) at Table IV-9.

⁶³ *Original Determination*, USITC Pub. 4034 at 16.

⁶⁴ *Original Determination*, USITC Pub. 4034 at 18. The Commission observed that in 2007 the largest supplier of SWG hangers from Mexico was affiliated with M&B. *Id.* at 15-16 & n.97.

⁶⁵ *Original Determination*, USITC Pub. 4034 at 18 n.124, IV-12. Table IV-9.

⁶⁶ *First Review*, USITC Pub. 4453 at 11 & n.54.

⁶⁷ CR/PR at I-14, Table I-6.

⁶⁸ Confidential First Review Staff Report, INV-MM-003 (Jan. 17, 2014), EDIS Doc. 827109 at I-21, Table I-7.

⁶⁹ *First Review*, USITC Pub. 4453 at 11.

⁷⁰ *Second Review*, USITC Pub. 4945 at 11-12.

⁷¹ *Second Review*, USITC Pub. 4945 at 12; Confidential Second Review at 12 (citing Confidential Second Review Staff Report, INV-RR-035 (Apr. 25, 2019), EDIS Doc. 872112 ("Confidential Second Review (Continued...))

percent, and nonsubject imports for *** percent.⁷² The Commission noted that Mexico had been the largest source of supply since 2016 and that other sources of nonsubject imports since 2014 included Cambodia, Laos, and Malaysia.⁷³

In the current review, the record indicates that the domestic industry accounted for the second-largest share of apparent U.S. consumption of SWG hangers and that subject imports accounted for the smallest share, while nonsubject imports were the largest source of supply to the U.S. market.⁷⁴

The domestic industry accounted for *** percent of apparent U.S. consumption in 2023, which is *** percentage points higher than in 2018.⁷⁵ According to M&B, there are currently four domestic producers of SWG hangers: M&B, Innovative Fabrication LLC/Indy Hanger, U.S. Hanger Co., LLC, and Ganchos N.V.⁷⁶ According to the information available, there were no major developments in the domestic industry during the period of review.⁷⁷

In 2023, subject imports accounted for *** percent of apparent U.S. consumption, a decrease of *** percentage points from 2018.⁷⁸ CBP conducted investigations under the Enforce and Protect Act (“EAPA”) and determined that SWG hangers from China were transshipped through India in 2020 and Thailand in 2021.⁷⁹

Nonsubject imports continued to represent the largest source of supply to the U.S. market in 2023, accounting for *** percent of apparent U.S. consumption that year, a

(...Continued)

Staff Report”) at I-2, Table I-1 and I-23, Table I-7). As previously discussed, in the second review M&B estimated that it accounted for *** percent of domestic production. Confidential Second Review at 16 & n.59. Thus, the apparent domestic consumption figure in the second review understated domestic consumption and would be higher than the figure reported by M&B if data from other domestic producers had been available.

⁷² *Second Review*, USITC Pub. 4945 at 12; Confidential Second Review at 16; Confidential Second Review Staff Report at I-23, Table I-7.

⁷³ *Second Review*, USITC Pub. 4945 at 12.

⁷⁴ CR/PR at I-14, Table I-6.

⁷⁵ CR/PR at I-14, Table I-6. As discussed in section III.B.1 above, domestic industry data coverage is lower in this review than in the original investigation and first review, though similar to that in the second review. Consequently, the domestic industry’s share of apparent U.S. consumption in 2023 is likely understated relative to that in the original investigation and first review.

⁷⁶ M&B Response at 10-11.

⁷⁷ CR/PR at I-9.

⁷⁸ CR/PR at I-14, Table I-6.

⁷⁹ M&B Response at Ex. 6, appending EAPA Cons. Case No. 7379: Notice of Determination as to Evasion (Sept. 23, 2020); EAPA Cons. Case 7501: Notice of Determination as to Evasion (Sept. 16, 2021).

decrease of *** percentage points from 2018.⁸⁰ Mexico continued to be the largest source of nonsubject imports during the period of review, and other sources of nonsubject imports included Cambodia and South Korea.⁸¹ Imports from Taiwan and Vietnam remain under antidumping duty orders and SWG hangers from Vietnam remain under a countervailing duty order.⁸² Those orders were continued on October 4, 2023.⁸³

3. Substitutability and Other Conditions

In the original investigation and prior reviews, the Commission found that there was generally a high degree of substitutability between domestically produced SWG hangers and subject imports and that price was an important factor affecting purchasing decisions.⁸⁴

The record in this review contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports or the importance of price in purchasing decisions has changed since the prior proceedings. M&B agrees that there continues to be a high level of substitutability between subject imports and the domestic like product and that price remains an important factor in purchasing conditions.⁸⁵ Accordingly, we again find that there is generally a high degree of substitutability between the domestic like product and subject imports, and that price remains an important factor in purchasing decisions.

Effective September 24, 2019, SWG hangers originating in China became subject to an additional 10 percent *ad valorem* duty pursuant to Section 301 of the Trade Act of 1974 (“section 301 duty”).⁸⁶ Effective May 10, 2019, the section 301 duty for SWG hangers from China was increased to 25 percent.⁸⁷

⁸⁰ CR/PR at I-14, Table I-6.

⁸¹ CR/PR at I-13, Table I-5. Responding purchasers reported no changes in the supply conditions for the applicable period of review. CR/PR at Appendix D, D-3 through D-4.

⁸² CR/PR at I-3, Table I-3.

⁸³ CR/PR at I-3, Table I-3; *see also Steel Wire Garment Hangers from Taiwan and the Socialist Republic of Vietnam: Continuation of Antidumping Duty Orders and Countervailing Duty Order*, 88 Fed. Reg. 70931 (Oct. 13, 2023).

⁸⁴ *Original Determination*, USITC Pub. 4034 at 17; *First Review*, USITC Pub. 4453 at 12; *Second Review*, USITC Pub. 4945 at 12.

⁸⁵ M&B Response at 9-10.

⁸⁶ 19 U.S.C. § 2411; CR/PR at I-5 n.20 (citing 83 Fed. Reg. 47974 (Sept. 21, 2018)).

⁸⁷ CR/PR at I-5 n.20 (citing 84 Fed. Reg. 20459 (May 9, 2019)).

Effective March 23, 2018, imports of carbon and certain alloy steel wire rod, an input to produce SWG hangers, became subject to an additional 25 percent *ad valorem* duty pursuant to Section 232 of the Trade Expansion Act of 1962.⁸⁸

C. Likely Volume of Subject Imports

1. Original Investigation and Prior Five-Year Reviews

In the original investigation, the Commission found that subject imports accounted for an increasing share of apparent U.S. consumption and increased relative to U.S. production during the POI.⁸⁹ Subject import volume increased from 1.0 billion hangers in 2005 to 2.7 billion hangers in 2007.⁹⁰ Subject import market share increased from 36.0 percent in 2005 to 63.2 percent in 2006 and 80.9 percent in 2007.⁹¹ The Commission found that subject imports gained market share at the direct expense of the domestic industry.⁹² As subject imports increased their market share from 2005 to 2007, the domestic industry's market share declined steadily from *** percent in 2005 to *** percent in 2007.⁹³ The Commission found the volume and the increase in volume of subject imports to be significant, both in absolute terms and relative to consumption and production in the United States.⁹⁴

In the first review, the Commission found that the volume of subject imports had declined since the imposition of the order, but remained at substantial levels during the period of review.⁹⁵ Although there was limited information on the record concerning production capacity in China, available data suggested that subject producers continued to manufacture SWG hangers and were highly export-oriented.⁹⁶ The Commission also found

⁸⁸ 19 U.S.C. § 1862; CR/PR at I-5. SWG hangers are not subject to Section 232 measures.

⁸⁹ *Original Determination*, USITC Pub. 4034 at 17.

⁹⁰ *Original Determination*, USITC Pub. 4034 at 17.

⁹¹ *Original Determination*, USITC Pub. 4034 at 17. The ratio of subject imports to U.S. production rose from 69.3 percent in 2005 to 260.7 percent in 2006 and 994.5 percent in 2007. *Id.* at 18.

⁹² *Original Determination*, USITC Pub. 4034 at 18.

⁹³ *Original Determination*, USITC Pub. 4034 at 18; Confidential *Original Determination* at 18.

⁹⁴ *Original Determination*, USITC Pub. 4034 at 18.

⁹⁵ *First Review*, USITC Pub. 4453 at 13; Confidential *First Review* at 17-18.

⁹⁶ *First Review*, USITC Pub. 4453 at 13.

that total Chinese exports within a broader classification of iron and steel wire products encompassing the subject merchandise had increased substantially from 2008 to 2012.⁹⁷

The Commission found that the United States remained an attractive market for subject producers.⁹⁸ There was a substantial volume of subject imports in the U.S. market during the period of review and the United States had been China's largest export market for iron and steel wire products.⁹⁹ Given these considerations, the Commission found that the subject producers were likely, absent the restraining effects of the order, to direct increased quantities of SWG hangers to the U.S. market, as they did during the original POI. Thus, the Commission found that the likely volume of subject imports, both in absolute terms and relative to consumption in the United States, would be significant if the order were revoked.¹⁰⁰

In the second review, the Commission found that subject imports remained in the U.S. market at volumes that fluctuated, but were generally lower than in the first review, both in absolute terms and as a share of apparent U.S. consumption.¹⁰¹ Although there was limited data regarding SWG hanger capacity or production in China, the Commission found, based on the information available, that subject producers continued to manufacture SWG hangers and were highly export-oriented, and that China continued to be the world's largest exporter of articles of iron or steel wire, a category that included SWG hangers and out-of-scope products.¹⁰²

The Commission also found that the United States remained an attractive market for subject producers, noting that they had virtually no home market and no meaningful third country export markets. The Commission also found that the subject producers' repeated efforts to evade the order reflected their continued interest in serving the U.S. market. Since the first review, the Commission noted, CBP had completed two EAPA investigations and determined that significant volumes of Chinese-origin SWG hangers had been transshipped through Thailand and Malaysia.¹⁰³ Accordingly, the Commission found that the

⁹⁷ *First Review*, USITC Pub. 4453 at 13.

⁹⁸ *First Review*, USITC Pub. 4453 at 13-14.

⁹⁹ *First Review*, USITC Pub. 4453 at 13-14.

¹⁰⁰ *First Review*, USITC Pub. 4453 at 14.

¹⁰¹ *Second Review*, USITC Pub. 4945 at 14.

¹⁰² *Second Review*, USITC Pub. 4945 at 14.

¹⁰³ *Second Review*, USITC Pub. 4945 at 14; *see also* M&B Response at 17 & Ex. 6, appending EAPA Case No. 15135 /7174: Notice of Final Determination as to Evasion (Aug. 14, 2017) and EAPA Case No. 7175: Notice of Final Determination as to Evasion (Mar. 15, 2018).

subject producers were likely, absent the restraining effects of the order, to export significant volumes of SWG hangers to the U.S. market.¹⁰⁴

2. Current Review

In the current review, the information available indicates that the order has continued to have a restraining effect on the volume of subject imports. The volume of subject imports fluctuated irregularly during the period of review, increasing from 8.4 million hangers in 2019 to 23.6 million hangers in 2020, before declining to 4.0 million hangers in 2021, increasing to 4.1 million hangers in 2022, and declining to 3.6 million hangers in 2023.¹⁰⁵ Subject imports accounted for *** percent of apparent U.S. consumption in 2023.¹⁰⁶ These data may understate the presence of subject imports in the U.S. market during 2020 and 2021, given CBP's final determinations that Chinese-origin SWG hangers during those years were transhipped through India and Thailand to evade the order.¹⁰⁷

The record in this expedited review contains limited information on the subject industry in China. The information available indicates that subject producers continue to have the ability and incentive to export significant levels of subject merchandise to the U.S. market in the event of revocation of the order. Although no subject producer responded to the Commission's notice of institution in this review, M&B has identified 37 possible producers of SWG hangers in China.¹⁰⁸

The available information also indicates that subject producers remain export-oriented. According to GTA data covering Chinese exports of articles of iron and steel wire, a product category that includes both SWG hangers and out-of-scope products, Chinese exports of such merchandise to the United States increased irregularly during the period of review from 364.7

¹⁰⁴ *Second Review*, USITC Pub. 4945 at 14-15.

¹⁰⁵ CR/PR at I-13, Table I-5.

¹⁰⁶ CR/PR at I-14, Table I-6.

¹⁰⁷ M&B Response at 18 & Ex. 6. There is no country-specific data on the record for nonsubject imports from India and Thailand. CR/PR at I-13, Table I-5. During the current period of review, nonsubject imports from countries other than China, Mexico, Cambodia, and South Korea fluctuated irregularly, decreasing from 348.9 million hangers in 2019 to 111 million hangers in 2020, before increasing to 134.6 million hangers in 2021 and to 170.8 million hangers in 2022, and then decreasing to 135 million hangers in 2023. *Id.*

¹⁰⁸ M&B Response at Ex. 3. The information available indicates that there have been no major developments to the subject industry since the second review, and M&B provided no information concerning such developments. CR/PR at I-15.

million in 2019 to 384.5 million in 2023.¹⁰⁹ GTA data also indicate that China was the world's largest exporter of such merchandise.¹¹⁰

The information available also indicates that the United States remains an attractive market to Chinese producers. Because the United States remains the world's only significant market for SWG hangers, subject producers have virtually no home market for SWG hangers and no meaningful alternative export markets.¹¹¹ Subject imports maintained a small presence in the U.S. market throughout the period of review, accounting for *** percent of apparent U.S. consumption in 2023, enabling subject producers to retain customers and distribution networks in the United States. CBP's final determinations under the EAPA that SWG hangers from China were transshipped through India and Thailand during the period of review, as they were transshipped through Thailand and Malaysia during the period examined in the second review, also demonstrate that subject producers in China continue to have a strong interest in supplying the U.S. market.¹¹²

Given the foregoing, including the significant and increasing volume of subject imports in the original investigation, the continued presence of subject imports during the period of review, the subject industry's large size and exports, the attractiveness of the U.S. market to subject producers, and CBP's transshipment findings, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to U.S. consumption, if the order were to be revoked.¹¹³

¹⁰⁹ CR/PR at I-16, Table I-7.

¹¹⁰ CR/PR at I-17, Table I-8.

¹¹¹ M&B Response at 13.

¹¹² M&B Response at 18 & Ex. 6.

¹¹³ Although subject imports from China are currently subject to a 25 percent *ad valorem* duty under section 301, neither M&B nor the responding purchasers indicate that this duty would prevent subject imports from entering the U.S. market at significant levels if the order were revoked. *See, generally*, M&B Response; CR/PR at D-3-4. Given the Chinese industry's large capacity and exports, the continued presence of subject imports in the U.S. market despite the imposition of the section 301 duties, and the attractiveness of the U.S. market, we find that the section 301 duties would not likely prevent subject imports from increasing to significant levels if the order were revoked.

The record of this expedited review contains no information on inventories of subject merchandise or the ability of subject producers to product shift. CR/PR at I-15. The record also indicates that SWG hangers from China have not been subject to other antidumping or countervailing duty investigations outside the United States. *Id.* at I-17.

D. Likely Price Effects

1. Original Investigation and Prior Reviews

In the original investigation, the Commission found that the domestic like product and the subject imports were largely substitutable and that price was an important factor in purchasing decisions.¹¹⁴ The Commission observed that there was underselling by the subject merchandise in 94 of 95 quarterly price comparisons, with margins of underselling ranging from 0.1 percent to 57.7 percent and averaging 30.0 percent.¹¹⁵ Based on these data, the Commission found that there was significant price underselling of the domestic like product by subject imports during the POI.¹¹⁶

The Commission found that the record evidence did not indicate that subject imports significantly depressed or suppressed domestic prices during the POI.¹¹⁷ Instead, it found that the domestic industry sacrificed sales volume to maintain its prices in the face of underselling by subject imports.¹¹⁸ On that basis, the Commission found that the significant underselling by the increasing volumes of subject imports had significant adverse effects on the domestic industry during the POI.¹¹⁹

In the first and second five-year reviews, due to the expedited nature of the reviews, the record did not contain pricing comparisons for the review period.¹²⁰ In each review, the Commission found that that the domestic like product and the subject imports were largely or highly substitutable and that price continued to be an important factor in purchasing decisions.¹²¹ The Commission also found that if the order were revoked, subject imports would likely undersell the domestic like product which would, in turn, likely cause the domestic producers to lose sales volume, cut prices, or restrain price increases.¹²² Thus, in each review, the Commission concluded that, in the event of revocation, increasing volumes

¹¹⁴ *Original Determination*, USITC Pub. 4034 at 19.

¹¹⁵ *Original Determination*, USITC Pub. 4034 at 19.

¹¹⁶ *Original Determination*, USITC Pub. 4034 at 19.

¹¹⁷ *Original Determination*, USITC Pub. 4034 at 20.

¹¹⁸ *Original Determination*, USITC Pub. 4034 at 20.

¹¹⁹ *Original Determination*, USITC Pub. 4034 at 20.

¹²⁰ *First Review*, USITC Pub. 4453 at 15; *Second Review*, USITC Pub. 4945 at 16.

¹²¹ *First Review*, USITC Pub. 4453 at 15; *Second Review*, USITC Pub. 4945 at 16.

¹²² *First Review*, USITC Pub. 4453 at 15; *Second Review*, USITC Pub. 4945 at 16.

of low-priced subject imports would likely have significant price effects on the domestic industry.¹²³

2. Current Review

As discussed above in section III.B.3, we continue to find a generally high degree of substitutability between subject imports and domestically produced SWG hangers, and that price remains an important factor in purchasing decisions.

The record in this expedited review does not contain new product-specific pricing information. Based on the available information, including the generally high degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, and the attractiveness of the U.S. market to subject producers, we find that if the order were revoked, the subject imports would likely undersell the domestic like product to gain market share, as occurred in the original investigation. Absent the discipline of the order, the significant volume of low-priced subject imports would likely take sales and market share from domestic producers and/or force the domestic industry to cut prices or forego needed price increases, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that subject imports would likely have significant price effects on the domestic industry if the order were revoked.

E. Likely Impact¹²⁴

1. Original Investigation and Prior Reviews

In the original investigation, the Commission found that the domestic industry's production, capacity utilization, shipments, and sales revenue declined overall during the POI. Domestic producers' market share declined each year from 2005 to 2007.¹²⁵ These producers' U.S. production and U.S. shipments of SWG hangers also declined each year from 2005 to 2007.¹²⁶ The domestic industry's capacity increased slightly and capacity utilization

¹²³ *First Review*, USITC Pub. 4453 at 15; *Second Review*, USITC Pub. 4945 at 16.

¹²⁴ In its expedited third review of the antidumping duty order, Commerce determined that revocation of the order would likely result in the continuation or recurrence of dumping with margins of up to 187.25 percent for China. *Final Results*, 89 Fed. Reg. at 88957.

¹²⁵ *Original Determination*, USITC Pub. 4034 at 22; Confidential Original Determination at 22.

¹²⁶ *Original Determination*, USITC Pub. 4034 at 22.

declined from 2005 to 2007, and net sales revenue followed production and shipment trends, declining steadily throughout the POI.¹²⁷ The average number of production-related workers, hours worked, and wages paid also declined from 2005 to 2007.¹²⁸ Productivity increased due to the industry's layoffs, but the industry's capital expenditures fell. The domestic industry's financial indicators – operating income, operating margins, and net sales measured by quantity and value – declined irregularly over the POI.¹²⁹ The domestic industry experienced operating losses and its ratio of operating income to net sales reflected these losses.¹³⁰

The Commission concluded that subject imports had a significant impact on the condition of the domestic industry during the POI.¹³¹ It found that subject imports increased significantly, both in absolute terms and relative to domestic production and consumption, and that subject imports gained market share at the expense of the domestic industry, undersold the domestic like product, adversely affected the performance of the domestic industry, and adversely affected employment levels and wages.¹³² The Commission further concluded that the significant underselling by subject imports and reduced sales volumes caused significant declines in the domestic industry's financial performance over the POI.¹³³

In the first and second reviews, the Commission concluded that the limited record in each review was insufficient for it to make a finding as to whether the domestic industry was vulnerable to the continuation or recurrence of material injury in the event of revocation of the order.¹³⁴ Based on the information available in each review, however, the Commission found that should the order be revoked, the likely significant volume and price effects of the subject imports would likely have a significant impact on the production, shipments, sales, market share, and revenues of the domestic industry.¹³⁵ Also, in both the first and second reviews, the Commission stated that these declines would likely have a direct adverse impact on the domestic industry's profitability. Accordingly, in each review the Commission

¹²⁷ *Original Determination*, USITC Pub. 4034 at 21-22 & 22 n.149.

¹²⁸ *Original Determination*, USITC Pub. 4034 at 23.

¹²⁹ *Original Determination*, USITC Pub. 4034 at 23.

¹³⁰ *Original Determination*, USITC Pub. 4034 at 23-24.

¹³¹ *Original Determination*, USITC Pub. 4034 at 24.

¹³² *Original Determination*, USITC Pub. 4034 at 24.

¹³³ *Original Determination*, USITC Pub. 4034 at 24.

¹³⁴ *First Review*, USITC Pub. 4453 at 16; *Second Review*, USITC Pub. 4945 at 17.

¹³⁵ *First Review*, USITC Pub. 4453 at 17; *Second Review*, USITC Pub. 4945 at 18.

concluded that, if the antidumping duty order were revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.¹³⁶

Further, in each review, the Commission considered whether there were other factors that may have had an impact on the domestic industry to ensure that it was not attributing injury from such other factors to subject imports. In the first review, the Commission found that no factors other than the subject imports were known to be a likely cause of material injury.¹³⁷ In the second review, the Commission recognized that nonsubject imports had a significant presence in the U.S. market. Given the general substitutability of SWG hangers from all sources, however, it found that the likely increase in subject imports would come at least in part at the expense of the domestic industry and have an adverse impact that was distinct from any impact caused by nonsubject imports.¹³⁸

2. Current Review

The record in this five-year review contains limited information concerning the domestic industry's performance since the previous review.

The available information indicates that there has been a long-term decline in the domestic industry's capacity, production, and U.S. shipments since the original investigation, although the industry was more *** in 2023 than in the final years examined in the prior proceedings.¹³⁹

In 2023, the domestic industry's capacity was *** hangers, its production was *** hangers, and its U.S. shipments were *** hangers, which were all lower than in the prior proceedings.¹⁴⁰ The industry's capacity utilization in 2023 was *** percent, which is higher than

¹³⁶ *First Review*, USITC Pub. 4453 at 17; *Second Review*, USITC Pub. 4945 at 18.

¹³⁷ *First Review*, USITC Pub. 4453 at 17.

¹³⁸ *Second Review*, USITC Pub. 4945 at 18.

¹³⁹ CR/PR at I-10, Table I-4. As discussed in section III.B.1 above, the data coverage of the domestic industry is lower in this review than in the original investigation or first review, though similar to that in the second review. Consequently, the data on the domestic industry's performance in 2023 may not be directly comparable to that in 2007 and 2012. CR/PR at I-10, Table I-4 note & Appendix B, B-3.

¹⁴⁰ CR/PR at I-10, Table I-4. In 2018, M&B's capacity was *** hangers, its production was *** hangers, and its U.S. commercial shipments were *** hangers. In 2012, the domestic industry's capacity was *** hangers, its production was *** hangers, and its U.S. commercial shipments were *** hangers. In 2007, the domestic industry's capacity was *** hangers, its production was *** hangers, and its U.S. commercial shipments were *** hangers. *Id.*

in 2007, but lower than in 2012 and 2018.¹⁴¹ In 2023, the industry's share of apparent U.S. consumption of *** percent was higher than in 2007 and 2018, but lower than in 2012.¹⁴² The industry's net sales value of \$*** in 2023 was lower than in 2012 and 2018, but higher than in 2007.¹⁴³ However, the industry's operating income of \$***, and its ratio of operating income to net sales of *** percent in 2023 were higher than in the prior proceedings.¹⁴⁴ This limited information (which covers only a *** of the industry's production) is insufficient for us to make a finding as to whether the domestic industry is vulnerable to continuation or recurrence of material injury in the event of revocation of the order.

Based on the information available in this review, we find that revocation of the order would likely result in a significant increase in subject import volume that would likely undersell the domestic like product to a significant degree. Given the generally high degree of substitutability between the domestic like product and subject imports and the importance of price to purchasers, significant volumes of low-priced subject imports would likely significantly undersell the domestic like product and capture sales and market share from the domestic industry and/or significantly depress or suppress prices for the domestic like product. The likely significant volume of imports and their significant price effects would likely have a significant adverse impact on the domestic industry's production, shipments, sales, market share, and revenues, which in turn would have a direct adverse impact on the domestic industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as not to attribute injury from other factors to the subject imports. Nonsubject imports maintained a significant presence in the U.S. market throughout the period of review and accounted for *** percent of apparent U.S.

¹⁴¹ In 2018, M&B's capacity utilization was *** percent. In 2012 the domestic industry's capacity utilization was *** percent, and in 2007, it was *** percent. CR/PR at I-10, Table I-4.

¹⁴² CR/PR at I-14, Table I-6. In 2023, M&B's share of apparent U.S. consumption was \$***. In 2018 M&B's share of apparent U.S. consumption was \$***. In 2012, the domestic industry's share of apparent U.S. consumption was \$***, and in 2007, it was \$***. *Id.*

¹⁴³ CR/PR at I-10, Table I-4. M&B's net sales in 2018 were \$***. In 2012, the domestic industry's net sales were \$***, and in 2007, they were \$***. *Id.*

¹⁴⁴ CR/PR at I-10, Table I-4. M&B's operating income in 2018 was \$***, and its ratio of operating income to net sales was *** percent. In 2012, the domestic industry reported an operating *** of ***, and an operating margin of *** percent. In 2007, the domestic industry reported an operating *** of ***, and an operating margin of *** percent. *Id.*

consumption during 2023.¹⁴⁵ Nevertheless, the record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant quantities or adversely affecting domestic prices after revocation of the order.¹⁴⁶ Given the substitutability of SWG hangers, regardless of source, and the importance of price to purchasing decisions, the presence of nonsubject imports in the U.S. market would likely not prevent the significant increase in low-priced subject imports that is likely after revocation from taking market share from the domestic industry, as well as from nonsubject imports, or from forcing domestic producers to lower their prices or forgo price increases in order to retain market share. Consequently, we find that any future effects of nonsubject imports would be distinct from the likely effects attributable to subject imports and that nonsubject imports would not prevent subject imports from having a significant impact on the domestic industry.

We recognize that apparent U.S. consumption was *** percent lower in 2023 than in 2018.¹⁴⁷ M&B attributed the decline to the COVID-19 pandemic, which increased telework and further reduced the dry cleaning of business apparel that had already been in long-term decline.¹⁴⁸ Responding purchasers ***.¹⁴⁹ To the extent that demand remains weak or declines, the significant volume of low-priced subject imports that is likely after revocation would exacerbate the effects of weak or declining demand on the domestic industry.

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

¹⁴⁵ CR/PR at I-14, Table I-6. The quantity of nonsubject imports fluctuated irregularly during the period of review, declining from 1.26 billion hangers in 2019 to 605.9 million hangers in 2020, before increasing to 740.8 million hangers in 2021 and 920.2 million hangers in 2022, and declining to 777.5 million hangers in 2023. CR/PR at I-13, Table I-5.

¹⁴⁶ Further, CBP's findings in 2020 and 2021 that Chinese-origin SWG hangers during those years were transshipped through India and Thailand to evade the order indicate that an unknown volume of imports that entered as nonsubject were actually subject imports. M&B Response at 18 & Ex. 6.

¹⁴⁷ CR/PR at I-14, Table I-6. As discussed in section III.B.1 above, the data coverage of the domestic industry in this review is similar to that in the second review.

¹⁴⁸ M&B Response at 16; *see also* CR/PR at I-9.

¹⁴⁹ CR/PR at D-3.

IV. Conclusion

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

Information obtained in this review

Background

On July 1, 2024, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted a review to determine whether revocation of the antidumping duty order on steel wire garment hangers (“SWG hangers”) from China would be likely to lead to continuation or recurrence of material injury.² All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.³ ⁴ Table I-1 presents information relating to the background and schedule of this proceeding:

Table I-1
SWG hangers: Information relating to the background and schedule of this proceeding

| Effective date | Action |
|-------------------|---|
| July 1, 2024 | Notice of initiation by Commerce (89 FR 54435, July 1, 2024) |
| July 1, 2024 | Notice of institution by Commission (89 FR 54519, July 1, 2024) |
| October 4, 2024 | Commission’s vote on adequacy |
| December 10, 2024 | Commerce’s results of its expedited review |
| January 24, 2025 | Commission’s determination and views |

¹ 19 U.S.C. 1675(c).

² 89 FR 54519, July 1, 2024. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of a five-year review of the subject antidumping order. 89 FR 54435, July 1, 2024.

³ As part of their response to the notice of institution, interested parties were requested to provide company-specific information. That information is presented in app. B. Summary data compiled in the original investigation are presented in app. C.

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

The original investigation

The original investigation resulted from a petition filed on July 31, 2007, with Commerce and the Commission by M&B Metal Products Company, Inc. (“M&B”), Leeds, Alabama.⁵ On August 14, 2008, Commerce determined that imports of SWG hangers from China were being sold at less than fair value (“LTFV”).⁶ The Commission determined on September 29, 2008, that the domestic industry was materially injured by reason of LTFV imports of SWG hangers from China.⁷ On October 6, 2008, Commerce issued its antidumping duty order with final weighted-average dumping margins ranging from 15.83 percent to 187.25 percent.⁸

The first five-year review

On December 20, 2013, the Commission determined that it would conduct an expedited review of the antidumping duty order on SWG hangers from China.⁹ On January 10, 2014, Commerce determined that revocation of the antidumping duty order on SWG hangers from China would be likely to lead to continuation or recurrence of dumping.¹⁰ On February 20, 2014, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹¹ Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective March 11, 2014, Commerce issued a continuation of the antidumping duty order on imports of SWG hangers from China.¹²

⁵ 72 FR 45069, August 10, 2007.

⁶ 73 FR 47587, August 14, 2008. Commerce subsequently amended its determination. 73 FR 53188, September 15, 2008.

⁷ 73 FR 57654, October 3, 2008.

⁸ 73 FR 58111, October 6, 2008.

⁹ 79 FR 1885, January 10, 2014.

¹⁰ 79 FR 1829, January 10, 2014.

¹¹ 79 FR 11126, February 27, 2014.

¹² 79 FR 13613, March 11, 2014.

The second five-year review

On May 7, 2019, the Commission determined that it would conduct an expedited review of the antidumping duty order on SWG hangers from China.¹³ On June 11, 2019, Commerce determined that revocation of the antidumping duty order on SWG hangers from China would be likely to lead to continuation or recurrence of dumping.¹⁴ On August 16, 2019, the Commission determined that material injury would be likely to continue or recur within a reasonably foreseeable time.¹⁵ Following affirmative determinations in the five-year review by Commerce and the Commission, effective August 28, 2019, Commerce issued a continuation of the antidumping duty order on imports of SWG hangers from China.¹⁶

Previous and related investigations

The Commission has conducted previous import relief investigations on SWG hangers or similar merchandise, as presented in table I-3.

Table I-3
SWG hangers: Previous and related Commission proceedings and current status

| Date | Number | Country | ITC original determination | Current status |
|------|-------------|---------|----------------------------|---|
| 2011 | 701-TA-487 | Vietnam | Affirmative | Order continued after second review, October 4, 2023. |
| 2011 | 731-TA-1197 | Taiwan | Affirmative | Order continued after second review, October 4, 2023. |
| 2011 | 731-TA-1198 | Vietnam | Affirmative | Order continued after second review, October 4, 2023. |

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

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

¹³ 84 FR 32217, July 5, 2019.

¹⁴ 84 FR 27091, June 11, 2019.

¹⁵ 84 FR 43615, August 21, 2019.

¹⁶ 84 FR 45127, August 28, 2019.

Commerce's five-year review

Commerce announced that it would conduct an expedited review with respect to the order on imports of SWG hangers from China with the intent of issuing the final results of this review based on the facts available not later than October 29, 2024.¹⁷ Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <https://access.trade.gov/public/FRNoticesListLayout.aspx> and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and antircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping duty order on imports of SWG hangers from China are noted in the sections titled "The original investigation" and "U.S. imports," if applicable.

The product

Commerce's scope

Commerce has defined the scope as follows:

The merchandise that is subject to the order is steel wire garment hangers, fabricated from carbon steel wire, whether or not galvanized or painted, whether or not coated with latex or epoxy or similar gripping materials, and/or whether or not fashioned with paper covers or capes (with or without printing) and/or nonslip features such as saddles or tubes. These products may also be referred to by a commercial designation, such as shirt, suit, strut, caped, or latex (industrial) hangers. Specifically excluded from the scope of the order are wooden, plastic, and other garment hangers that are not made of steel wire. Also excluded from the scope of the order are chrome-plated steel wire garment hangers with a diameter of 3.4 mm or greater.¹⁸

¹⁷ Letter from Jill E. Pollack, Senior Director, Office VII, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, August 21, 2024.

¹⁸ 84 FR 45127, August 28, 2019.

U.S. tariff treatment

SWG hangers are currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 7326.20.0020. The merchandise subject to this review may also be imported under HTS statistical reporting number 7323.99.9080. The general rate of duty is 3.9 percent ad valorem for HTS subheading 7326.20.00 and 3.4 percent ad valorem for HTS subheading 7323.99.90.¹⁹ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Effective September 24, 2018, SWG hangers originating in China were subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for SWG hangers was increased to 25 percent.²⁰ SWG hangers are not subject to additional duties or quotas under section 232 of the Trade Expansion Act of 1962.²¹

¹⁹ USITC, HTS (2024) Revision 8, Publication 5537, August 2024, pp. 73-42–73-43.

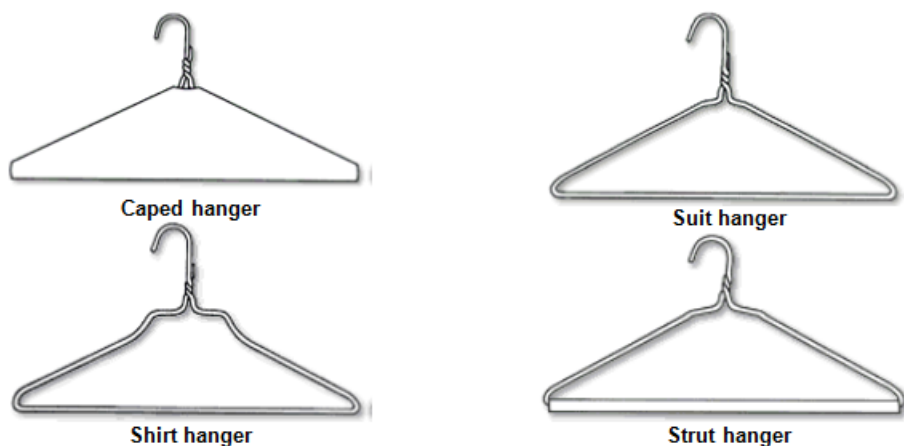
²⁰ 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS heading 9903.88.03 and U.S. notes 20(e)–20(f) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Revision 8, Publication 5537, August 2024, pp. 99-III-28–99-III-52, 99-III-311. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

²¹ Articles of iron or steel wire classified under HTS subheading 7326.20.00 are not subject to section 232 tariffs. However, effective March 23, 2018, imports of carbon and certain alloy steel wire rod and drawn wire (inputs for the production of SWG hangers) are subject to additional 25 percent ad valorem Section 232 duties or, in certain cases, tariff-rate or absolute quotas. Section 232 import duties on steel articles currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are exempt from section 232 duties and quotas on steel articles, while imports originating in Argentina, Brazil, and South Korea are exempt from duties but are instead subject to absolute quotas. EU member countries (effective January 1, 2022), Japan (effective April 1, 2022), and the United Kingdom (effective June 1, 2022) are currently subject to tariff-rate quotas (“TRQs”) for steel articles, and imports that exceed the TRQ limits are subject to the section 232 tariffs. Section 232 import duties on steel articles originating in Turkey were temporarily raised from 25 percent to 50 percent, effective August 13, 2018, but restored to 25 percent effective May 21, 2019. In addition, section 232 duties on steel articles originating in Ukraine are suspended, effective June 1, 2022, to June 1, 2025. 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; 89 FR 227, January 3, 2024; 89 FR 48233, June 5, 2024

Description and uses²²

SWG hangers are designed and formed to permit clothing and other textiles to be draped and/or suspended from the product. SWG hangers are produced primarily for use by the dry cleaning, industrial laundry, textile, and uniform rental industries. The four most common varieties of dry-cleaning hangers are caped hangers, shirt hangers, suit hangers, and strut hangers (figure I-1). Each of these general categories includes a range of hangers in varying sizes and finishes, but with common distinguishing features. Caped hangers have a paper “cape” or cover, normally white and often with commercial or custom printing. Strut hangers have a paper tube that runs along the length of the bottom of the hanger. The wire does not run through the paper tube but is instead folded in at the edges. This paper tube, or “strut,” may be coated with a nonslip material to prevent the garment from falling off of the hanger. Hangers for light items, such as the basic shirt hanger, are produced using the thinnest wire, while hangers for heavier items, such as suit hangers, are produced from heavier wire. SWG hangers are generally painted and sold in a variety of colors. Despite some obvious differences in finishes and paper accessories, all of these hangers share the same basic configuration, characteristics, and end uses.

Figure I-1
SWG hangers: Common varieties



Source: Second review publication, p. I-10 (figure I-1).

²² Unless otherwise noted, this information is based on Steel Wire Garment Hangers from China, Investigation No. 731-TA-1123 (Second Review), USITC Publication 4945, August 2019 (“Second review publication”), pp. I-7-I-8.

SWG hangers produced for use in industrial laundries, or the uniform rental market are known as textile or uniform rental hangers or as industrial hangers. These hangers are normally produced using a 13-gauge wire to support the weight of newly washed textiles and uniforms. Industrial laundries and uniform rental companies typically require a more substantial gauge hanger in a consistent shape to fit their high-speed processing equipment. These hangers are sometimes made of galvanized (zinc-coated) steel wire. The bottom bar of these hangers may be coated with a latex or other coating to prevent pants slippage after laundering.

Manufacturing process²³

There are no substantial differences in the production process or uses for industrial hangers and dry-cleaning hangers. The manufacturing process to produce SWG hangers consists of purchasing low-carbon steel wire in coils, whether or not galvanized, or drawing wire from low-carbon steel wire rod, cutting the wire to length, and fabricating the hangers. After the wire is straightened and cut to length, the hangers are formed and painted. The process may be continuous or require separate stages to straighten, cut, and form the hanger, and painting may take place either before or after the hanger is formed. The manufacturing equipment and process for galvanized wire hangers are similar, but galvanized SWG hangers do not require painting because the zinc coating prevents the steel wire from rusting. In all cases, the forming machines are dedicated to the production of hangers; they are not used and cannot be used to produce other products. Wire forming machines may be made in-house by SWG hanger manufacturers or purchased from a small number of companies in China, Switzerland, and Taiwan that produce these machines.

After forming and painting, some hangers require the addition of a paper covering or “cape,” which can be plain or printed with custom or stock messages for drycleaner customers. In addition, strut hangers receive a cardboard tube or “strut” along the bottom bar on which drycleaners hang pants. Although referred to by a separate name in the industry, these hangers are produced using the same equipment and workers as the various types of dry cleaning hangers described above.

The formation of the hanger itself is similar throughout the world. Operations such as the addition of capes and struts and painting the wire may differ in the amount of the processing that is done by machine versus that which is performed manually. In some parts of the world, such as Vietnam, environmental regulations preclude painting of SWG hangers;

²³ Unless otherwise noted, this information is based on second review publication, pp. I-9-I-10.

therefore, they are powder coated to provide corrosion resistance, apparently with thermosetting epoxy powder. Epoxy powder is typically applied by electrically charging and spraying the powder so that it accumulates on a grounded metal article, after which the article is sent to a curing oven to fuse-on the coating. Most hangers going to dry cleaners are packed in boxes containing 500 hangers. However, thicker hangers (struts, drapery, and polo knit hangers) are packed in boxes containing 250 hangers. In the United States, the quantity to be packed in a box is determined by weight, while in China the hangers are counted and packed manually. All of the common types of SWG hangers mentioned above are produced in China.

The industry in the United States

U.S. producers

During the final phase of the original investigation, the Commission received U.S. producer questionnaires from seven firms, which accounted for approximately *** percent of production of SWG hangers in the United States during 2007.²⁴ During the first five-year review, domestic interested parties provided a list of six known and currently operating U.S. producers of SWG hangers. Three responding firms accounted for the vast majority of production of SWG hangers in the United States during 2012.²⁵ During the second five-year review, the domestic interested party provided a list of four known and currently operating U.S. producers of SWG hangers. One responding firm accounted for approximately *** percent of production of SWG hangers in the United States during 2018.²⁶

In response to the Commission's notice of institution in this current review, domestic interested parties provided a list of four known and currently operating U.S. producers of SWG hangers. One firm providing U.S. industry data in response to the Commission's notice of institution accounted for approximately *** percent of production of SWG hangers in the United States during 2023.²⁷

²⁴ Investigation No. 731-TA-1123 (Final): Steel Wire Garment Hangers from China, Confidential Report, INV-FF-109, August 27, 2008, ("Original confidential report"), p. III-1.

²⁵ Steel Wire Garment Hangers from China, Investigation No. 731-TA-1123 (Review), USITC Publication 4453, February 2014 ("First review publication"), p. I-12.

²⁶ Investigation No. 731-TA-1123 (Second Review): Steel Wire Garment Hangers from China, Confidential Report, INV-RR-035, April 25, 2019, as revised in INV-RR-065, July 17, 2019 ("Second review confidential report"), p. I-2.

²⁷ Domestic interested party's response to the notice of institution, July 30, 2024, exhibit 5.

Recent developments

Casual workplace and work-from-home trends reportedly have contributed to a decline in U.S. demand for SWG hangers since the Commission's last five-year review.²⁸ The domestic interested party reported that the COVID-19 pandemic and the subsequent increase in teleworking resulted in a decline in demand for business apparel cleaning from dry cleaners, which affected demand for wire hangers. This trend has continued into 2024 as a large share of private and public sector workers are still working from home regularly. However, demand for SWG hangers from the textile rental industry has not been affected and remains steady according to the domestic interested party.²⁹

There were no major developments in the SWG hangers industry since the continuation of the orders identified by interested parties in this proceeding and no relevant information from outside sources was found.

²⁸ Steel Wire Garment Hangers from Taiwan and Vietnam, Investigation No. 701-TA-487 and 731-TA-1197-1198 (Second Review), USITC Publication 5464, September 2023, pp. I-11.

²⁹ Domestic interested party's response to the notice of institution, July 30, 2024, p. 16.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year review. Table I-4 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigation and subsequent five-year reviews.

Table I-4
SWG hangers: Trade and financial data submitted by U.S. producers, by period.

Quantity in 1,000 hangers; value in 1,000 dollars; unit value in dollars per 1,000 hangers; ratio in percent

| Item | Measure | 2007 | 2012 | 2018 | 2023 |
|---|------------|-------|-------|-------|-------|
| Capacity | Quantity | *** | *** | *** | *** |
| Production | Quantity | *** | *** | *** | *** |
| Capacity utilization | Ratio | *** | *** | *** | *** |
| U.S. shipments | Quantity | *** | *** | *** | *** |
| U.S. shipments | Value | *** | *** | *** | *** |
| U.S. shipments | Unit value | \$*** | \$*** | \$*** | \$*** |
| Net sales | Value | *** | *** | *** | *** |
| COGS | Value | *** | *** | *** | *** |
| COGS to net sales | Ratio | *** | *** | *** | *** |
| Gross profit or (loss) | Value | *** | *** | *** | *** |
| SG&A expenses | Value | *** | *** | *** | *** |
| Operating income or (loss) | Value | *** | *** | *** | *** |
| Operating income or (loss) to net sales | Ratio | *** | *** | *** | *** |

Source: For the years 2007, 2012, and 2018, data are compiled using data submitted in the Commission's original investigation, first review, and second review, respectively. For the year 2023, data are compiled using data submitted by the domestic interested party. Domestic interested party's response to the notice of institution, July 30, 2024, exhibit 5.

Note: The trade and financial data for calendar year 2007 does not include Laidlaw or United Wire Hangers, which were excluded from the domestic industry in the original investigation.

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

Definitions of the domestic like product and domestic industry.

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related party's provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if "appropriate circumstances" exist.³⁰

In its original determination, the Commission defined a single domestic industry consisting of all domestic producers of SWG hangers, with the exception of two domestic firms, Laidlaw Company LLC and United Wire Hangers Corporation. In its expedited first and second five-year review determinations, the Commission defined a single domestic industry consisting of all domestic producers of SWG hangers.³¹ In its original determination and its expedited first and second five-year review determinations, the Commission defined a single domestic like product consisting of all the various types of SWG hangers, co-extensive with Commerce's scope.

³⁰ Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

³¹ 89 FR 54519, July 1, 2024.

U.S. importers

During the final phase of the original investigation, the Commission received U.S. importer questionnaires from 27 firms, which accounted for approximately *** percent of total U.S. imports of SWG hangers from China during 2007.³² Import data presented in the original investigation are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its first five-year review, the domestic interested parties provided a list of 98 firms that may have imported SWG hangers from China.³³ Import data presented in the first review are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its second five-year review, the domestic interested parties provided a list of 74 firms that may have imported SWG hangers from China.³⁴ Import data presented in the second review are based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in this current review, in its response to the Commission's notice of institution, the domestic interested party provided a list of 83 potential U.S. importers of SWG hangers.³⁵

³² Original confidential report, p. IV-1.

³³ First review publication, p. I-13.

³⁴ Second review publication, p. I-13.

³⁵ Domestic interested party's response to the notice of institution, July 30, 2024, exhibit 2.

U.S. imports

Table I-5 presents the quantity, value, and unit value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2023 imports by quantity).

Table I-5
SWG hangers: U.S. imports, by source and period

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

| U.S. imports from | Measure | 2019 | 2020 | 2021 | 2022 | 2023 |
|--------------------|------------|-----------|---------|---------|---------|---------|
| China (Subject) | Quantity | 8,444 | 23,615 | 4,001 | 4,073 | 3,625 |
| Mexico | Quantity | 392,935 | 251,629 | 367,415 | 373,199 | 311,514 |
| Cambodia | Quantity | 316,841 | 111,367 | 165,332 | 283,485 | 201,993 |
| South Korea | Quantity | 205,758 | 131,878 | 73,533 | 92,712 | 129,008 |
| All other sources | Quantity | 348,858 | 111,039 | 134,554 | 170,807 | 135,023 |
| Nonsubject sources | Quantity | 1,264,393 | 605,913 | 740,835 | 920,203 | 777,537 |
| All import sources | Quantity | 1,272,837 | 629,528 | 744,836 | 924,276 | 781,162 |
| China (Subject) | Value | 2,120 | 2,804 | 1,624 | 2,605 | 1,708 |
| Mexico | Value | 16,225 | 10,326 | 19,034 | 23,313 | 19,268 |
| Cambodia | Value | 15,120 | 5,491 | 11,031 | 19,995 | 13,136 |
| South Korea | Value | 9,589 | 5,617 | 4,456 | 8,221 | 8,340 |
| All other sources | Value | 22,304 | 10,785 | 11,808 | 15,863 | 8,029 |
| Nonsubject sources | Value | 63,239 | 32,219 | 46,329 | 67,392 | 48,773 |
| All import sources | Value | 65,358 | 35,023 | 47,953 | 69,997 | 50,481 |
| China (Subject) | Unit value | 251 | 119 | 406 | 639 | 471 |
| Mexico | Unit value | 41 | 41 | 52 | 62 | 62 |
| Cambodia | Unit value | 48 | 49 | 67 | 71 | 65 |
| South Korea | Unit value | 47 | 43 | 61 | 89 | 65 |
| All other sources | Unit value | 64 | 97 | 88 | 93 | 59 |
| Nonsubject sources | Unit value | 50 | 53 | 63 | 73 | 63 |
| All import sources | Unit value | 51 | 56 | 64 | 76 | 65 |

Source: Compiled from official Commerce statistics for HTS statistical reporting number 7326.20.0020, accessed July 16, 2024.

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

Apparent U.S. consumption and market shares

Table I-6 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table I-6
SWG hangers: Apparent U.S. consumption and market shares, by source and period

Quantity in 1,000 hangers; value in 1,000 dollars; shares in percent

| Source | Measure | 2007 | 2012 | 2018 | 2023 |
|---------------------------|-------------------|-----------|-----------|-----------|---------|
| U.S. producers | Quantity | *** | *** | *** | *** |
| China | Quantity | 2,697,369 | 941,678 | 25,856 | 3,625 |
| Nonsubject sources | Quantity | 347,824 | 1,051,484 | 1,422,159 | 777,537 |
| All import sources | Quantity | 3,045,193 | 1,993,161 | 1,448,016 | 781,162 |
| Apparent U.S. consumption | Quantity | 3,334,602 | *** | *** | *** |
| U.S. producers | Value | *** | *** | *** | *** |
| China | Value | 83,595 | 41,446 | 3,454 | 1,708 |
| Nonsubject sources | Value | 11,802 | 43,752 | 66,693 | 48,773 |
| All import sources | Value | 95,397 | *** | 70,147 | 50,481 |
| Apparent U.S. consumption | Value | 107,759 | *** | *** | *** |
| U.S. producers | Share of quantity | 8.7 | *** | *** | *** |
| China | Share of quantity | 80.9 | *** | *** | *** |
| Nonsubject sources | Share of quantity | 10.4 | *** | *** | *** |
| All import sources | Share of quantity | 91.3 | *** | *** | *** |
| U.S. producers | Share of value | 11.5 | *** | *** | *** |
| China | Share of value | 77.6 | *** | *** | *** |
| Nonsubject sources | Share of value | 11.0 | *** | *** | *** |
| All import sources | Share of value | 88.5 | *** | *** | *** |

Source: For the years 2007, 2012, and 2018, data are compiled using data submitted in the Commission's original investigation, first five-year review, and second five-year review, respectively. For the year 2023, U.S. producers' U.S. shipments are compiled from the domestic interested party's response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting number 7326.20.0020, accessed July 16, 2024.

Note: Apparent U.S. consumption for 2007 includes U.S. shipments from Laidlaw and United Wire Hangers, while U.S. producers' U.S. shipments for that year does not include U.S. shipments from those firms. Laidlaw and United Wire Hangers were excluded from the domestic industry in the original investigation.

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

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

The industry in China

Producers in China

During the final phase of the original investigation, the Commission received foreign producer/exporter questionnaires from 14 firms, which accounted for approximately *** of reported production of SWG hangers in China and exports to the United States from China.³⁶

Although the Commission did not receive responses from any respondent interested parties in its first five-year review, the domestic interested party provided a list of 36 possible producers of SWG hangers in China in that proceeding.³⁷

Although the Commission did not receive responses from any respondent interested parties in its second five-year review, the domestic interested party provided a list of 37 possible producers of SWG hangers in China in that proceeding.³⁸

Although the Commission did not receive responses from any respondent interested parties in this five-year review, the domestic interested party provided a list of 37 possible producers of SWG hangers in China.³⁹

Recent developments

There were no major developments in the Chinese industry since the continuation of the order identified by interested parties in the proceeding and no relevant information from outside sources was found.

³⁶ Original confidential report, p. VII-4.

³⁷ First review publication, p. I-16.

³⁸ Second review publication, p. I-18.

³⁹ Domestic interested party's response to the notice of institution, July 30, 2024, exhibit 3.

Exports

Table I-7 presents export data for articles of iron or steel wire, a category that includes SWG hangers and out-of-scope products, from China (by export destination in descending order of quantity for 2023). The leading export markets of articles of iron or steel wire from China, in 2023, were the United States, Vietnam, and Malaysia, accounting for 21.9 percent, 13.3 percent, and 7.2 percent of total exports, respectively.

Table I-7
Articles of iron or steel wire: Value of exports from China, by destination, 2019-23

Value in 1,000 dollars

| Destination market | 2019 | 2020 | 2021 | 2022 | 2023 |
|---------------------------|-------------|-------------|-------------|-------------|-------------|
| United States | 364,667 | 403,189 | 530,056 | 527,374 | 384,475 |
| Vietnam | 115,596 | 97,886 | 100,354 | 137,206 | 137,953 |
| Japan | 113,508 | 120,258 | 155,252 | 164,945 | 122,550 |
| Malaysia | 40,669 | 62,289 | 68,530 | 134,173 | 103,367 |
| Korea, South | 43,872 | 56,287 | 86,022 | 78,518 | 73,212 |
| Taiwan | 13,952 | 15,175 | 42,127 | 139,044 | 67,627 |
| Philippines | 24,585 | 31,261 | 52,123 | 73,348 | 63,362 |
| Australia | 38,399 | 47,366 | 59,485 | 77,526 | 63,212 |
| United Kingdom | 46,038 | 53,521 | 62,875 | 67,608 | 52,306 |
| Singapore | 25,427 | 23,545 | 25,540 | 91,628 | 52,059 |
| All other markets | 551,881 | 540,065 | 705,485 | 804,057 | 630,998 |
| All markets | 1,378,594 | 1,450,842 | 1,887,849 | 2,295,427 | 1,751,121 |

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7326.20 accessed July 30, 2024. These data are likely to be overstated as HS subheading 7326.20 may contain products outside the scope of this review.

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

Third-country trade actions

Based on available information, SWG hangers from China have not been subject to other antidumping or countervailing duty investigations outside the United States.

The global market

Table I-8 presents global export data for articles of iron and steel wire, a category that includes SWG hangers and out-of-scope products, (by export source in descending order of value for 2023). In 2023, the five leading global exporters of articles of iron or steel wire, in terms of value, were China, followed by Germany, Czech Republic, Netherlands, and Poland, accounting for 40.7 percent, 6.6 percent, 5.8 percent, 4.9 percent, and 4.7 percent of global exports, respectively. The value of total world exports increased by 20.0 percent from 2019 to 2023.

Table I-8
Articles of iron or steel wire: Global exports by major sources, 2019-23

Value in 1,000 dollars

| Exporting country | 2019 | 2020 | 2021 | 2022 | 2023 |
|---------------------|-----------|-----------|-----------|-----------|-----------|
| China | 1,378,594 | 1,450,842 | 1,887,849 | 2,295,427 | 1,751,121 |
| Germany | 241,473 | 242,392 | 288,928 | 296,374 | 284,705 |
| Czech Republic | 161,603 | 159,568 | 225,877 | 291,585 | 250,658 |
| Netherlands | 220,351 | 245,887 | 257,507 | 274,890 | 210,908 |
| Poland | 157,801 | 137,043 | 189,283 | 222,550 | 201,096 |
| United States | 134,592 | 106,672 | 142,014 | 158,643 | 158,091 |
| Belgium | 150,823 | 142,722 | 156,018 | 169,721 | 123,163 |
| Canada | 65,828 | 61,004 | 84,649 | 112,582 | 111,485 |
| Italy | 104,921 | 111,797 | 134,948 | 114,642 | 111,096 |
| France | 84,734 | 73,631 | 95,408 | 98,649 | 100,297 |
| All other exporters | 887,187 | 872,698 | 1,213,834 | 1,158,242 | 1,002,097 |
| All exporters | 3,587,908 | 3,604,257 | 4,676,315 | 5,193,305 | 4,304,718 |

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7326.20 accessed July 30, 2024. These data may be overstated as HS subheading 7326.20 may contain products outside the scope of this review.

Note: Because of rounding, figures may not add to total shown. Quantity data not available for global exports due to a mix of units of quantity reported by exporters.

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 54435 July 1, 2024 | <i>Initiation of Five-Year (Sunset) Reviews</i> | https://www.govinfo.gov/content/pkg/FR-2024-07-01/pdf/2024-14459.pdf |
| 89 FR 54519 July 1, 2024 | <i>Steel Wire Garment Hangers from China; Institution of a Five-Year Review</i> | https://www.govinfo.gov/content/pkg/FR-2024-07-01/pdf/2024-14456.pdf |

APPENDIX B
RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission’s notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject review. It was filed on behalf of M&B Metal Products Company, Inc (“M&B”), a domestic producer of SWG hangers (referred to herein as “domestic interested party”).¹

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

Table I-2
SWG hangers: Summary of responses to the Commission’s notice of institution

| Interested party type | Number | Coverage |
|-----------------------|--------|----------|
| U.S. producer | 1 | ***% |

Note: The U.S. producer coverage figure presented is the domestic interested party’s estimate of its share of total U.S. production of SWG hangers during 2023. Domestic interested party’s response to the notice of institution, July 30, 2024, exhibit 5.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct an expedited or full review from the domestic interested party. The domestic interested party requests that the Commission conduct an expedited review of the antidumping duty order on SWG hangers.²

¹ Domestic interested party’s response to the notice of institution, July 30, 2024, p. 1.

² Domestic interested party’s comments on adequacy, September 3, 2024, p. 2.

Company-specific information

Table B-2
SWG hangers: Response checklist for U.S. producers

Yes = provided response; no = did not provide a response; NA = not available; not known = information was not known

| Item | M&B Metal Products Company. Inc. |
|---|----------------------------------|
| Nature of operation | Yes |
| Statement of intent to participate | Yes |
| Statement of likely effects of revoking the order | Yes |
| U.S. producer list | Yes |
| U.S. importer/foreign producer list | Yes |
| List of 3-5 leading purchasers | Yes |
| List of sources for national/regional prices | NA |
| Trade/financial data | Yes |
| Changes in supply/demand | Yes |
| Complete response | Yes |

APPENDIX C

SUMMARY DATA COMPILED IN PREVIOUS PROCEEDINGS

Table C-4

SWG hangers: Summary data concerning the U.S. market (excluding Laidlaw and United Wire), 2005-07, January-March 2007, and January-March 2008

(Quantity=1,000 hangers, value=1,000 dollars, unit values, unit labor costs, and unit expenses are per 1,000 hangers; period changes=percent, except where noted)

| Item | Reported data | | | | Period changes | | | | |
|---|---------------|-----------|-----------|-----------------------|----------------|---------|---------|---------|----------------------|
| | 2005 | 2006 | 2007 | January-March 2007 | 2008 | 2005-07 | 2005-06 | 2006-07 | Jan.-Mar. 2007-08 |
| U.S. consumption quantity: | | | | | | | | | |
| Amount | 2,901,595 | 2,811,415 | 3,334,602 | 778,773 | *** | 14.9 | -3.1 | 18.6 | *** |
| Producers' share (1): | | | | | | | | | |
| Laidlaw & United Wire | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| All other producers | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Total producers | 53.1 | 25.7 | 8.7 | 11.7 | *** | -44.4 | -27.5 | -17.0 | *** |
| Importers' share (1): | | | | | | | | | |
| China | 36.0 | 63.2 | 80.9 | 76.2 | *** | 44.9 | 27.2 | 17.7 | *** |
| Other sources | 10.9 | 11.1 | 10.4 | 12.1 | *** | -0.4 | 0.2 | -0.7 | *** |
| Total imports | 46.9 | 74.3 | 91.3 | 88.3 | *** | 44.4 | 27.5 | 17.0 | *** |
| U.S. consumption value: | | | | | | | | | |
| Amount | 119,653 | 97,623 | 107,759 | 24,199 | *** | -9.9 | -18.4 | 10.4 | *** |
| Producers' share (1): | | | | | | | | | |
| Laidlaw & United Wire | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| All other producers | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Total producers | 56.8 | 31.1 | 11.5 | 15.3 | *** | -45.3 | -25.7 | -19.6 | *** |
| Importers' share (1): | | | | | | | | | |
| China | 33.0 | 57.7 | 77.6 | 71.7 | *** | 44.6 | 24.7 | 19.9 | *** |
| Other sources | 10.2 | 11.2 | 11.0 | 13.0 | *** | 0.7 | 1.0 | -0.2 | *** |
| Total imports | 43.2 | 68.9 | 88.5 | 84.7 | *** | 45.3 | 25.7 | 19.6 | *** |
| U.S. imports from-- | | | | | | | | | |
| China: | | | | | | | | | |
| Quantity | 1,044,701 | 1,777,680 | 2,697,369 | 593,419 | 626,354 | 158.2 | 70.2 | 51.7 | 5.6 |
| Value | 39,445 | 56,335 | 83,595 | 17,342 | 22,682 | 111.9 | 42.8 | 48.4 | 30.8 |
| Unit value | \$37.76 | \$31.69 | \$30.99 | \$29.22 | \$36.21 | -17.9 | -16.1 | -2.2 | 23.9 |
| Ending inventory quantity | 78,475 | 109,418 | 249,269 | 132,506 | 185,476 | 217.6 | 39.4 | 127.8 | 40.0 |
| All other sources: | | | | | | | | | |
| Quantity | 315,631 | 312,182 | 347,824 | 94,469 | 102,094 | 10.2 | -1.1 | 11.4 | 8.1 |
| Value | 12,231 | 10,928 | 11,802 | 3,147 | 3,812 | -3.5 | -10.7 | 8.0 | 21.1 |
| Unit value | \$38.75 | \$35.01 | \$33.93 | \$33.31 | \$37.34 | -12.4 | -9.7 | -3.1 | 12.1 |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| All sources: | | | | | | | | | |
| Quantity | 1,360,331 | 2,089,862 | 3,045,193 | 687,888 | 728,448 | 123.9 | 53.6 | 45.7 | 5.9 |
| Value | 51,677 | 67,263 | 95,397 | 20,489 | 26,494 | 84.6 | 30.2 | 41.8 | 29.3 |
| Unit value | \$37.99 | \$32.19 | \$31.33 | \$29.79 | \$36.37 | -17.5 | -15.3 | -2.7 | 22.1 |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| U.S. producers' (2) | | | | | | | | | |
| Average capacity quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Production quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Capacity utilization (1) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| U.S. shipments: | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Export shipments: | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Inventories/total shipments (1) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Production workers | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Hours worked (1,000s) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Wages paid (\$1,000s) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Hourly wages | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Productivity (hangers per hour) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit labor costs | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Net sales: | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Cost of goods sold (COGS) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Gross profit or (loss) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| SG&A expenses | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Operating income or (loss) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Capital expenditures | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit COGS | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit SG&A expenses | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit operating income or (loss) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| COGS/sales (1) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Operating income or (loss)/ sales (1) | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| U.S. shipments by Laidlaw/United Wire: | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** |

(1) "Reported data" are in percent and "period changes" are in percentage points.

(2) Excluding Laidlaw and United Wire.

(3) Undefined.

(4) Not applicable.

Note.--Financial data are reported on a fiscal year basis and may not necessarily be comparable to data reported on a calendar year basis. Because of rounding, figures may not add to the totals shown. Unit values and shares are calculated from the unrounded figures.

Source: Compiled from data submitted in response to Commission questionnaires and from official Commerce statistics.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. The domestic interested party named the following six firms as top purchasers of SWG hangers: ***. Purchaser questionnaires were sent to the first five firms, and three firms, ***, provided responses, which are presented below.

1. Have there been any significant changes in the supply and demand conditions for SWG hangers that have occurred in the United States or in the market for SWG hangers in China since January 1, 2019?

| Purchaser | Yes / No | Changes that have occurred |
|-----------|----------|----------------------------|
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |

2. Do you anticipate any significant changes in the supply and demand conditions for SWG hangers in the United States or in the market for SWG hangers in China within a reasonably foreseeable time?

| Purchaser | Yes / No | Anticipated changes |
|------------------|-----------------|----------------------------|
| *** | *** | *** |
| *** | *** | *** |
| *** | *** | *** |

