# Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey

Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fourth Review)

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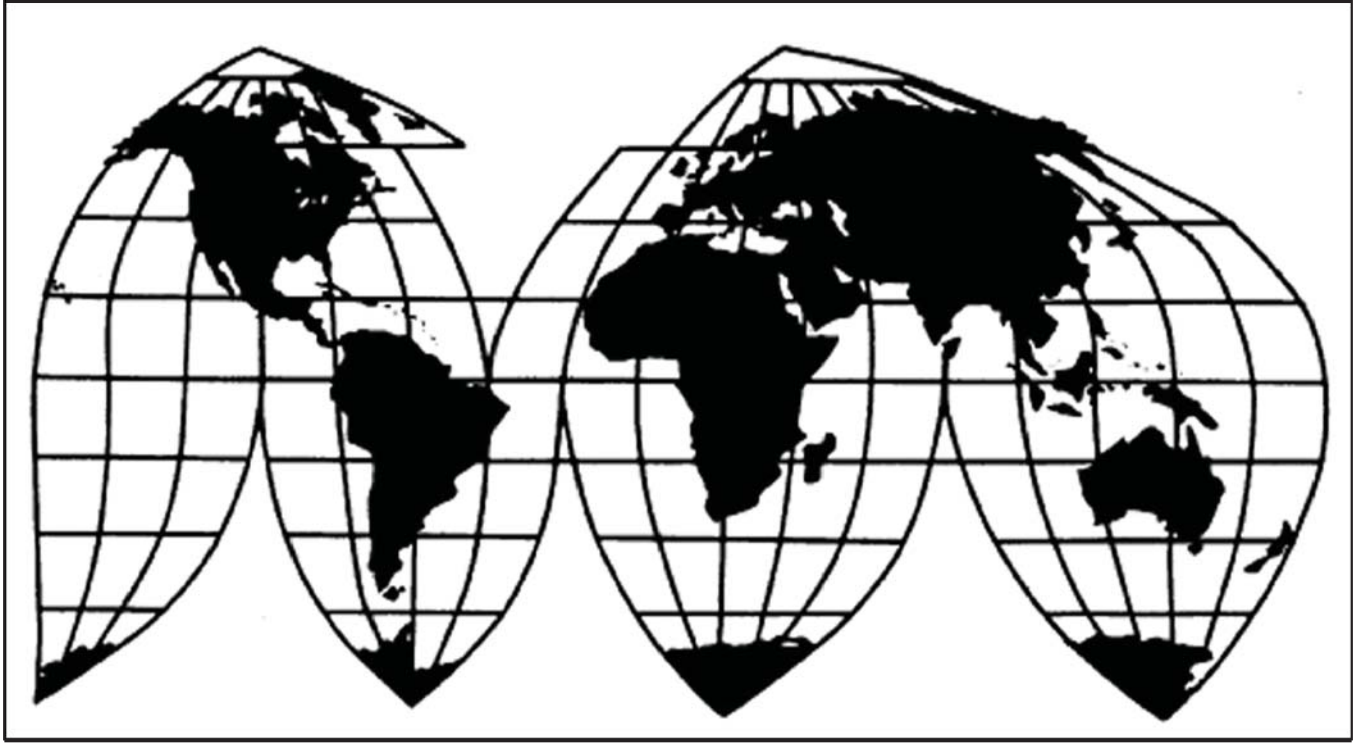

**Washington, DC 20436**

# U.S. International Trade Commission

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**CONTENTS**

**CONTENTS**



Note.—Information that would reveal confidential operations of individual concerns may not be published and therefore has been deleted. Such deletions are indicated by asterisks.

**UNITED STATES INTERNATIONAL TRADE COMMISSION**

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Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey

## DETERMINATION

On the basis of the record[1] developed in the subject five-year reviews, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that revocation of the countervailing duty order on certain circular welded pipe and tube from Turkey and revocation of the antidumping duty orders on certain circular welded pipe and tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

## BACKGROUND

The Commission, pursuant to section 751(c) of the Act (19 U.S.C. 1675(c)), instituted these reviews on June 1, 2017 (82 F.R. 25328) and determined on September 5, 2017 that it would conduct expedited reviews (82 F.R. 49423, October 25, 2017).

[1] The record is defined in sec. 207.2(f) of the Commission's Rules of Practice and Procedure (19 CFR 207.2(f)).

## Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended ("the Tariff Act"), that revocation of the countervailing duty order on imports of certain circular welded pipe ("CWP") from Turkey and the antidumping duty orders on CWP from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

## I. Background

*Original Investigations:* The orders at issue in these reviews followed from a series of original investigations.[1] On April 17, 1984, the Commission determined that a domestic industry was materially injured by reason of imports of small-diameter circular welded carbon steel pipe and tube from Taiwan sold at less than fair value ("LTFV").[2] On February 12, 1986, two Commissioners determined that a domestic industry was materially injured and two found the industry threatened with material injury by reason of subsidized imports from Turkey and by LTFV imports from Thailand of welded carbon steel standard pipe and tube.[3] On April 21, 1986, two Commissioners determined that a domestic industry was materially injured and one Commissioner found the domestic industry threatened with material injury by reason of LTFV imports of standard pipe and tube from India and Turkey.[4] On October 20, 1992, the Commission determined that a domestic industry was materially injured by reason of LTFV

[1] Confidential Report ("CR")/Public Report ("PR") at Table I-2 (tabulating original investigations).

[2] *Certain Welded Carbon Steel Pipes and Tubes from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-131, 132, and 138 (Final), USITC Pub. 1519 (Apr. 1984) ("Original Determination for Taiwan"). The Department of Commerce ("Commerce") issued an antidumping duty order on this product on May 7, 1984. 49 Fed. Reg. 19369 (May 7, 1984).

[3] *Certain Welded Carbon Steel Pipes and Tubes from Turkey and Thailand*, Inv. Nos. 701-TA-253 and 731-TA-252 (Final), USITC Pub. 1810 (Feb. 1986) ("Original Determinations for Turkey and Thailand"). Commerce issued countervailing and antidumping duty orders on these products on March 7 and March 11, 1986, respectively. 51 Fed. Reg. 7984 (Mar. 7, 1986) (Turkey) (CVD); 51 Fed. Reg. 8341 (Mar. 11, 1986) (Thailand) (AD).

[4] *Certain Welded Carbon Steel Pipes and Tubes from India, Taiwan, and Turkey*, Inv. Nos. 731-TA-271–273 (Final), USITC Pub. 1839 (Apr. 1986) ("Original Determinations for India and Turkey"). Commerce issued antidumping duty orders on May 12 and May 15, 1986. 51 Fed. Reg. 17384 (May 12, 1986) (India); 51 Fed. Reg. 17784 (May 15, 1986) (Turkey).

imports of standard and structural pipe and tube from Brazil, Korea, Mexico, Taiwan (those imports not already subject to order), and Venezuela.[5]

*First Reviews:* In May 1999, the first five-year reviews of the preceding CWP orders were grouped for review with certain antidumping duty orders on imports of light-walled rectangular pipe and tube ("LWR pipe") in order to promote administrative efficiency due to similarities in the products and/or market participants.[6] With respect to CWP, the Commission conducted full reviews and made a negative determination concerning imports from Venezuela and affirmative determinations concerning imports from Brazil, India, Korea, Mexico, Taiwan (two orders), Thailand, and Turkey (two orders).[7]

*Second Reviews:* In the second five-year reviews instituted on July 1, 2005, the nine CWP orders again were grouped with certain orders on LWR pipe.[8] With respect to CWP, the Commission conducted full reviews and determined that revocation of the orders on imports from the seven subject countries would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[9]

*Third Reviews:* In the third five-year reviews instituted on July 1, 2011, the nine CWP orders were grouped with the lone remaining order on LWR pipe from the prior reviews (Taiwan).[10] With respect to CWP, the Commission conducted full reviews and determined that

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[5] *Certain Circular, Welded, Non-Alloy Steel Pipes and Tubes from Brazil, the Republic of Korea, Mexico, Romania, Taiwan, and Venezuela*, Inv. Nos. 731-TA-532–537 (Final), USITC Pub. 2564 (Oct. 1992) ("Original Determinations for Brazil, Korea, Mexico, and Taiwan") (also making a negative injury determination regarding imports from Romania that the Commission concluded were negligible); Commerce issued antidumping orders on November 2, 1992. 57 Fed. Reg. 49453 (Nov. 2, 1992) (Brazil, Korea, and Mexico); 57 Fed. Reg. 49454 (Nov. 2, 1992) (Taiwan).

There were no appeals of the Commission's final determinations in the original investigations or of any five-year reviews that resulted in a court decision.

[6] *Certain Pipe and Tube from Argentina, Brazil, Canada, India, Korea, Mexico, Singapore, Taiwan, Thailand, Turkey, and Venezuela*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 276, 277, 296, 409, 410, 532–534, 536, and 537 (Review), USITC Pub. 3316 at 6 (July 2000) ("First Five-Year Reviews").

At the time of the first reviews, these orders were also grouped with orders regarding various oil country tubular goods ("OCTG"). The Commission made negative first five-year review determinations concerning all OCTG orders. *Id.* at 3.

[7] First Five-Year Reviews, USITC Pub. 3316 at 3.

[8] *Certain Pipe and Tube from Argentina, Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 409, 410, 532–534, and 536 (Second Review), USITC Pub. 3867 at 4–5 (July 2006) ("Second Five-Year Reviews").

[9] Second Five-Year Reviews, USITC Pub. 3867 at 3, 16 (exercising its discretion to cumulate subject imports from all seven subject countries).

[10] *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253, 731-TA-132, 252, 271, 273, 532–534, and 536 (Third Review), USITC Pub. 4333 at 4, n.12 (June 2012) ("Third Five-Year Reviews").

revocation of the orders on imports from the seven subject countries would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[11]

*Current Reviews:* On June 1, 2017, the Commission instituted the current five-year reviews to determine whether revoking the nine orders on CWP would be likely to lead to continuation or recurrence of material injury to a domestic industry.[12] The Commission received a joint response to the notice of institution filed on behalf of four domestic producers of CWP: Bull Moose Tube Company, EXLTUBE, TMK IPSCO Tubulars, and Zekelman Industries (collectively the "domestic interested parties").[13] The government of Turkey also responded to the notice of institution.[14] On September 5, 2017, the Commission determined in each review that the domestic interested party group response to its notice of institution was adequate and that the respondent interested party group response was inadequate.[15] The Commission did not find any other circumstances that would warrant conducting full reviews and determined that it would conduct expedited reviews of the orders pursuant to section 751(c)(3) of the Tariff Act.[16] On December 15, 2017, the domestic interested parties filed comments with the Commission pursuant to 19 C.F.R. § 207.62(d).[17]

In these fourth five-year reviews, U.S. industry data are based on information submitted by the four responding domestic producers in their response to the notice of institution.[18] These producers estimate that they accounted for *** percent of domestic production of CWP

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[11] Third Five-Year Reviews, USITC Pub. 4333 at 27, 45 (exercising its discretion to cumulate subject imports from all seven subject countries).

[12] 82 Fed. Reg. 25328 (June 1, 2017). Commerce initiated its five-year reviews of these nine orders on June 2, 2017. 82 Fed. Reg. 25599 (June 2, 2017); 82 Fed. Reg. 27690 (June 16, 2017) (correction). It issued the results of its expedited reviews thereafter. 82 Fed. Reg. 46485 (Oct. 5, 2017); 82 Fed. Reg. 46761 (Oct. 6, 2017); 82 Fed. Reg. 46768 (Oct. 6, 2017).

[13] Domestic Interested Parties' Response, EDIS Doc. 616044 (July 3, 2017) at 1.

[14] Respondent Interested Party Response to the Notice of Institution, EDIS Doc. 616033 (July 3, 2017) and Respondent Interested Party Response to Staff Questions, EDIS Doc. 618574 (July 21, 2017) (hereinafter collectively "Respondent Interested Party Response").

[15] Explanation of Commission Determination on Adequacy, EDIS Doc. 622908 (Sept. 13, 2017).

[16] Explanation of Commission Determination on Adequacy. In the reviews concerning CWP from Turkey, the Commission unanimously determined that the response from the government of Turkey was individually adequate. Because the government of Turkey did not itself represent a substantial share of production or exports of subject merchandise from Turkey, nor did its response indicate that it would be able to provide the type of information concerning the subject industry in Turkey that the Commission would seek to collect in a full review, the Commission found that the respondent interested party group response was inadequate. *Id.*

Commissioner Broadbent found the respondent interested party group response adequate in the reviews concerning CWP from Turkey and voted to conduct full reviews of all nine orders. *Id.*

[17] Domestic Interested Parties' Final Comments, EDIS Doc. 631693 (Dec. 15, 2017).

[18] Domestic Interested Parties' Response at 1.

in 2016.[19] U.S. import data and related information are based on official import statistics. Foreign industry data and related information are based on information from the original investigations and prior reviews, as well as available information submitted by domestic interested parties in these expedited reviews and publicly available information, such as Global Trade Atlas ("GTA") data.

## II. Domestic Like Product and Industry

### A. Scope of the Orders Under Review and Background on Product and Scope Issues

The Department of Commerce ("Commerce") has used several different formulations in defining the imported products in the scope of the various orders subject to these reviews.[20] The 1984 antidumping duty order encompasses only circular carbon welded steel pipe from Taiwan between 0.375 inches and 4.5 inches in outside diameter, i.e., small-diameter CWP.[21] The 1992 antidumping duty order includes product from Taiwan over 4.5 inches, but not more than 16 inches, in outside diameter, and contains numerous exclusions.[22] The remaining CWP orders generally cover circular welded non-alloy steel pipes not more than 16 inches in outside diameter, but vary in terms of outside wall thickness specifications and product exclusions.[23]

Producers manufacture CWP in standard diameters and wall thicknesses to American Society for Testing and Material ("ASTM") specifications for use in plumbing and heating systems, air conditioning units, machinery, buildings, sprinkler systems, irrigation systems, and water wells for low-pressure conveyance of air, steam, natural gas, water, oil, or other liquids and gases.[24] The product, sometimes referenced as standard pipe, is used in light load-bearing, mechanical, and structural applications and may be galvanized (zinc coated by dipping in molten zinc), lacquered (black finish), or painted (black) to provide corrosion resistance for storage in humid conditions or ocean transport.[25]

Producers primarily make CWP to ASTM specifications A53, A135, and A795.[26] Since these standards often require engineering characteristics that overlap with other specifications, a pipe may be dual stenciled, i.e., stamped to indicate compliance with two different specifications, such as ASTM A53 and API 5L.[27] Dual-stenciled pipe, which enters as line pipe

[19] CR/PR at Table I-1; CR at I-2, PR at I-2.
[20] *See* CR/PR at Table I-3 (providing scope definitions for individual orders).
[21] CR/PR at Table I-3.
[22] CR/PR at Table I-3.
[23] CR/PR at Table I-3.
[24] CR at I-19, PR at I-15.
[25] CR at I-20 to I-21; PR at I-16.
[26] CR at I-20, PR at I-16.
[27] CR at I-20, PR at I-16.

under a different subheading of the Harmonized Tariff Schedule of the United States ("HTS") for U.S. customs purposes, is not within the scope of the orders.[28]

CWP is also used for structural or load-bearing purposes aboveground by the construction industry and for structural purposes in ships, trailers, farm equipment, and similar uses.[29] It is produced in nominal wall thicknesses and sizes, primarily to ASTM specifications such as A500 or A252, as well as to American Society of Mechanical Engineers specifications.[30]

Furthermore, CWP also may be used in light load-bearing and mechanical applications, such as for fence tubing, scaffolding components, or conduit shells that protect electrical wiring.[31] Fence tubing can be produced to ASTM specification F 1083, which covers hot-dipped galvanized welded steel pipe used for fence structures, but it also can be produced without reference to an ASTM specification or to a general specification, such as ASTM A513.[32]

### B. 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."[33] 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."[34] 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.[35]

#### 1. The Original Investigations

The domestic like products defined by the Commission in the various underlying CWP original investigations differed from one another in some respects because of differences in wall thicknesses and excluded products among the CWP scope definitions. In each of the

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[28] CR at I-20, PR at I-16.

[29] CR at I-20 to I-21, PR at I-16.

[30] CR at I-21, PR at I-16.

[31] CR at I-20, PR at I-16.

[32] CR at I-20, PR at I-16.

[33] 19 U.S.C. § 1677(4)(A).

[34] 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).

[35] *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).

original investigations, the domestic like product definitions generally conformed to Commerce's scope definition for the corresponding original investigation.[36]

### 2. First Five-Year Reviews

In the first five-year reviews, all parties expressing a position on the issue asked the Commission to reconsider the domestic like product definition and to define a single domestic like product consisting of all circular welded non-alloy steel pipes and tubes not more than 16 inches in outside diameter.[37] After considering the record and party arguments, the Commission agreed and applied the requested domestic like product definition to all orders under review.[38]

### 3. Second and Third Five-Year Reviews

In the second and third five-year reviews, no party argued that the domestic like product definition in the first five-year reviews should be revisited, and the record in each of these prior reviews did not indicate any changes in the relevant facts.[39] Consequently, the Commission again defined the domestic like product as all circular, welded, non-alloy steel pipes and tubes not more than 16 inches in outside diameter.[40]

### 4. The Current Reviews

In these fourth five-year reviews, the domestic interested parties agree with the domestic like product definition adopted by the Commission in the prior reviews.[41] There is no

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[36] There were two principal exceptions. In the 1992 investigation concerning CWP from Taiwan, the Commission's domestic like product definition included CWP between 0.375 and 4.5 inches in diameter, which Commerce had excluded from the scope of the investigation because it was already covered by the 1984 antidumping duty order. Additionally, in the 1992 investigations concerning imports from Brazil, Korea, Mexico, and Taiwan (large diameter), the Commission defined finished conduit and mechanical tubing, which were not entirely excluded from the scope of those investigations, as separate like products from CWP, and it made negative final determinations regarding imports from Brazil, Korea, Mexico, Romania, Taiwan, and Venezuela of finished conduit and mechanical tubing that was not cold drawn or cold rolled. Original Determinations for Brazil, Korea, Mexico, and Taiwan, USITC Pub. 2564 at 5, 8–17.

[37] First Five-Year Reviews, USITC Pub. 3316 at 12.

[38] First Five-Year Reviews, USITC Pub. 3316 at 12.

[39] Second Five-Year Reviews, USITC Pub. 3867 at 7; Third Five-Year Reviews, USITC Pub. 4333 at 10.

[40] Second Five-Year Reviews, USITC Pub. 3867 at 7; Third Five-Year Reviews, USITC Pub. 4333 at 10.

[41] Domestic Interested Parties' Response at 23; Domestic Interested Parties' Final Comments at 2. The respondent interested party did not provide a responsive comment on the definition of the domestic like product. Respondent Interested Party Response at 12.

new information in the record indicating that the characteristics and uses of CWP have changed since the prior reviews.[42] We therefore again define a single domestic like product consisting of circular, welded, non-alloy steel pipes and tubes not more than 16 inches in outside diameter (also referred to as "CWP").

### C. 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."[43] 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 each of the original investigations and the subsequent reviews, the Commission defined the domestic industry to include all domestic producers of CWP.[44] There were no related party issues in the original investigations.[45] In the first and second five-year reviews, the Commission found a domestic producer, ***, to be a related party, but concluded that appropriate circumstances did not exist to exclude it from the domestic industry.[46]

In the third five-year reviews, three firms were potentially subject to exclusion as related parties.[47] The Commission found that, even assuming *arguendo* that the firms were related parties, appropriate circumstances did not exist to exclude them.[48]

In these fourth five-year reviews, there is no information on the record indicating that a different definition of the domestic industry is warranted or any domestic producers are related parties.[49] No party has argued otherwise.[50] Accordingly, we define the domestic industry as all domestic producers of CWP.

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[42] *See generally* CR at I-18 to I-23, PR at I-14 to I-18.

[43] 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.

[44] Original Determination for Taiwan, USITC Pub. 1519 at 4; Original Determinations for Turkey and Thailand, USITC Pub. 1810 at 7; Original Determinations for India and Turkey, USITC Pub. 1839 at 6–7; Original Determinations for Brazil, Korea, Mexico, and Taiwan, USITC Pub. 2564 at 8.

[45] Original Determination for Taiwan, USITC Pub. 1519 at 4; Original Determinations for Turkey and Thailand, USITC Pub. 1810 at 7; Original Determinations for India and Turkey, USITC Pub. 1839 at 6–7; Original Determinations for Brazil, Korea, Mexico, and Taiwan, USITC Pub. 2564 at 8.

[46] First Five-Year Reviews, USITC Pub. 3316 at 18–19; Confidential First Five-Year Review Determinations, EDIS Doc. 458850 at 23–25; Second Five-Year Reviews, USITC Pub. 3867 at 8–9; Confidential Second Five-Year Review Determinations, EDIS Doc. 458587 at 12–13 and n.41.

[47] Third Five-Year Reviews, USITC Pub. 4333 at 11.

[48] Third Five-Year Reviews, USITC Pub. 4333 at 11.

[49] The domestic interested parties stated that none of the four domestic producers that jointly responded to the notice of institution import "any product from subject countries." Domestic Interested Parties' Response at 21.

## III. Cumulation

### A. Legal Standard

> With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows: the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.[51]

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.[52] The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

### B. Prior Proceedings

Because the orders in these five-year reviews originated from a series of original investigations initiated and conducted over a span of several years, the Commission observed that the first reviews provided the initial opportunity to consider cumulation with respect to all orders subject to review.[53] In the prior five-year reviews, the Commission rejected arguments that certain imports were likely to have no discernible adverse impact on the domestic industry

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(…Continued)

[50] Domestic Interested Parties' Response at 23; Domestic Interested Parties' Final Comments at 2. The respondent interested party did not provide a responsive comment on the definition of the domestic industry. Respondent Interested Party Response at 12.

[51] 19 U.S.C. § 1675a(a)(7).

[52] 19 U.S.C. § 1677(7)(G)(i); *see also*, *e.g.*, *Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337–38 (Ct. Int'l Trade 2008).

[53] Second Five-Year Reviews, USITC Pub. 3867 at 11.

if each of the corresponding orders were revoked or that subject imports would likely compete under different conditions of competition.[54] The Commission exercised its discretion to cumulate subject imports from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey.[55]

### C. Analysis

In these fourth five-year reviews, the statutory threshold for cumulation is satisfied because all reviews were initiated on the same day: June 1, 2017.[56] In addition, we consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject countries are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether there is a likelihood of a reasonable overlap of competition among subject imports and the domestic like product; and (3) whether subject imports are likely to compete in the U.S. market under different conditions of competition.[57]

#### 1. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.[58] Neither the statute nor the Uruguay Round Agreements Act Statement of Administrative Action ("SAA") provides specific guidance on what factors the Commission is to consider in determining that imports "are likely to have no discernible adverse impact" on the domestic industry.[59] With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

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[54] First Five-Year Reviews, USITC Pub. 3316 at 26; Second Five-Year Reviews, USITC Pub. 3867 at 11–14, 16; Third Five-Year Reviews, USITC Pub. 4333 at 13.

[55] First Five-Year Reviews, USITC Pub. 3316 at 26; Second Five-Year Reviews, USITC Pub. 3867 at 11–14, 16; Third Five-Year Reviews, USITC Pub. 4333 at 13. In the first five-year review, the Commission further found that subject imports from Venezuela were likely to have no discernible adverse impact on the domestic industry if the relevant order were revoked and therefore did not cumulate imports from Venezuela with other subject imports. First Five-Year Reviews, USITC Pub. 3316 at 26.

[56] 82 Fed. Reg. 25328 (June 1, 2017).

[57] The domestic interested parties maintain the Commission should cumulate subject imports from all seven countries based on the considerations found in the prior reviews. Domestic Interested Parties' Response at 14; Domestic Interested Parties' Final Comments at 5. The respondent interested party made no statements or arguments related to the statutory criteria for cumulation.

[58] 19 U.S.C. § 1675a(a)(7).

[59] SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

Based on the record in these reviews, we do not find that imports from any of the seven subject countries are likely to have no discernible adverse impact on the domestic industry in the event of revocation of the corresponding orders.[60]

*Brazil.* In 1991, during the original investigation, subject imports from Brazil totaled 54,000 short tons and accounted for 2.8 percent of apparent U.S. consumption.[61] The level of these imports fluctuated between 0 and 622 short tons in 1998 and each year from 2005 to 2011.[62] During the current period of review, subject imports from Brazil were present in the U.S. market in each year. Import levels were highest in 2013 at 1,620 short tons and lowest in 2014 at 201 short tons.[63] The share of apparent U.S. consumption represented by these imports was zero or less than 0.1 percent in 1998, 2001, each year from 2005 to 2011, and in 2016.[64]

Although there are minimal data on the record concerning current capacity in Brazil, the domestic interested parties identified seven firms they believe to be producers of CWP in Brazil.[65] In prior reviews, the Commission found that the Brazilian CWP industry was export oriented and had substantial unused capacity.[66] GTA data for HTS subheading 7306.30, a category that includes CWP and may also include out-of-scope merchandise, indicate that the U.S. market was Brazil's seventh-largest export destination in 2016 and that Brazilian exports of CWP globally declined from 18,054 short tons in 2012 to 12,521 short tons in 2016.[67]

In light of the foregoing, we do not find that subject imports from Brazil would likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

*India.* In 1985, during the original investigation, subject imports from India totaled 22,000 short tons and accounted for 0.9 percent of apparent U.S. consumption.[68] The level of these imports fluctuated between *** and *** short tons in 1998 and each year from 2005 to 2011.[69] During the current period of review, subject imports from India increased from *** short tons in 2012 to *** short tons in 2015 before declining to *** short tons in 2016.[70] The

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[60] The domestic interested parties argue that revocation of any of the orders in these reviews would have a discernible adverse impact on the domestic industry. Domestic Interested Parties' Final Comments at 6.

[61] CR/PR at Appendix C.

[62] CR/PR at Appendix C; Third Five-Year Reviews, USITC Pub. 4333 at Table IV-1.

[63] CR/PR at Table I-5.

[64] CR/PR at Table I-7 and Appendix C.

[65] Domestic Interested Parties' Response at Exhibit 8; CR at I-27, PR at I-___.

[66] First Five-Year Reviews, USITC Pub. 3316 at 36; Second Five-Year Reviews, USITC Pub. 3867 at 11–12; Third Five-Year Reviews, USITC Pub. 4333 at 37–38.

[67] CR/PR at Table I-8.

[68] CR/PR at Appendix C.

[69] CR/PR at Table I-6 and Appendix C.

[70] CR/PR at Table I-5.

share of apparent U.S. consumption represented by these imports varied between *** and *** percent in 1991, 1998, and 2005–2011 and was *** percent in 2016.[71]

Although there are minimal data on the record concerning current capacity in India, the domestic interested parties identified five firms they believe to be producers of CWP in India.[72] In prior reviews, the Commission found that the Indian CWP industry was export oriented, had substantial unused capacity, and faced trade barriers in third-country markets.[73] GTA data for HTS subheading 7306.30, a category that includes CWP and may also include out-of-scope merchandise, indicate that Indian exports of CWP globally increased from 110,646 short tons in 2012 to 209,268 short tons in 2016.[74] CWP from India is subject to antidumping and countervailing duties in Canada.[75] GTA data indicate that India was the ninth-largest global exporter of CWP in 2016.[76]

In light of the foregoing, we do not find that subject imports from India would likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

*Korea.* In 1991, during the original investigation, subject imports from Korea totaled 325,000 short tons and accounted for 16.9 percent of apparent U.S. consumption.[77] The level of these imports fluctuated between *** and *** short tons in 1998, 2001, and each year from 2005 to 2011.[78] During the current period of review, subject imports from Korea increased from 56,510 short tons in 2012 to 87,668 short tons in in 2016.[79] The share of apparent U.S. consumption represented by these imports varied between *** and *** percent in 1998 and 2005–2011 and was 6.0 percent in 2016.[80]

Although there are minimal data on the record concerning current capacity in Korea, the domestic interested parties identified 10 firms they believe to be producers of CWP in Korea.[81] In prior reviews, the Commission found that the Korean CWP industry was export oriented, had substantial unused capacity, and faced trade barriers in third-country markets.[82] GTA data for HTS subheading 7306.30, a category that includes CWP and may also include out-of-scope merchandise, indicate that the U.S. market became the largest export market for CWP from

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[71] CR/PR at Table I-7 and Appendix C.

[72] Domestic Interested Parties' Response at Exhibit 8; CR at I-27, PR at I-21.

[73] First Five-Year Reviews, USITC Pub. 3316 at 36; Second Five-Year Reviews, USITC Pub. 3867 at 11–12; Third Five-Year Reviews, USITC Pub. 4333 at 37.

[74] CR/PR at Table I-9.

[75] CR at I-59, PR at I-43 to I-44.

[76] CR at I-61, PR at I-44; CR/PR at Table I-13.

[77] CR/PR at Appendix C.

[78] CR/PR at Table I-6 and Appendix C.

[79] CR/PR at Table I-5.

[80] CR/PR at Table I-7 and Appendix C.

[81] Domestic Interested Parties' Response at Exhibit 8; CR at I-27, PR at I-21.

[82] First Five-Year Reviews, USITC Pub. 3316 at 36; Second Five-Year Reviews, USITC Pub. 3867 at 11–12; Third Five-Year Reviews, USITC Pub. 4333 at 37.

Korea in 2016, accounting for 31.9 percent of Korean exports; that Korean exports of CWP globally increased from 405,031 short tons in 2012 to 449,754 short tons in 2016; and that Korean exports of CWP to the U.S. market increased from 108,983 short tons in 2012 to 143,341 short tons in 2016.[83] CWP from Korea is subject to antidumping duties in Canada.[84] GTA data indicate that Korea was the fourth-largest global exporter of CWP (behind China, Italy, and Turkey) each year from 2013 to 2016.[85]

In light of the foregoing, we do not find that subject imports from Korea would likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

*Mexico.* In 1991, during the original investigation, subject imports from Mexico totaled 48,000 short tons and accounted for 2.5 percent of apparent U.S. consumption.[86] The level of these imports fluctuated between *** and *** short tons in 1998, 2001, and each year from 2005 to 2011.[87] During the current period of review, subject imports from Mexico declined from 66,490 short tons in 2012 to 57,765 short tons in 2014 and then increased to 61,038 short tons in 2016.[88] The share of apparent U.S. consumption represented by these imports varied between *** and *** percent in 1998, 2001, and 2005–2011 and was 4.2 percent in 2016.[89]

Although there are minimal data on the record concerning current capacity in Mexico, the domestic interested parties identified eight firms they believe to be producers of CWP in Mexico.[90] In prior reviews, the Commission found that the Mexican CWP industry was export oriented and had substantial unused capacity.[91] GTA data for HTS subheading 7306.30, a category that includes CWP and may include out-of-scope merchandise, indicate that the U.S. market was the largest export market for CWP from Mexico during each year in the current period of review, accounting for 91.1 percent of Mexican exports in 2016, and that Mexican exports of CWP to the U.S. market decreased from 101,770 short tons in 2012 to 88,407 short tons in 2016.[92]

In light of the foregoing, we do not find that subject imports from Mexico would likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

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[83] CR/PR at Table I-9.

[84] CR at I-59, PR at I-43 to I-44. The record in these reviews indicates that Korean exports of CWP to Australia may be subject to antidumping duties currently. CR at I-58, PR at I-43.

[85] CR at I-61, PR at I-44; CR/PR at Table I-13.

[86] CR/PR at Appendix C.

[87] CR/PR at Table I-6 and Appendix C.

[88] CR/PR at Table I-5.

[89] CR/PR at Table I-7 and Appendix C.

[90] Domestic Interested Parties' Response at Exhibit 8; CR at I-27, PR at I-21.

[91] First Five-Year Reviews, USITC Pub. 3316 at 36; Second Five-Year Reviews, USITC Pub. 3867 at 11–12; Third Five-Year Reviews, USITC Pub. 4333 at 37.

[92] CR/PR at Table I-9.

*Taiwan.*[93] In 1983, during one of the original investigations, subject imports from Taiwan totaled 131,000 short tons and accounted for 6.6 percent of apparent U.S. consumption.[94] The level of these imports fluctuated between *** and *** short tons in 1998, 2001, and each year from 2005 to 2011.[95] During the current period of review, subject imports from Taiwan increased from 2,910 short tons in 2012 to 14,487 short tons in 2016.[96] The share of apparent U.S. consumption represented by these imports varied between *** and *** percent in 1998, 2001, and 2005–2011 and was 1.0 percent in 2016.[97]

Although there are minimal data on the record concerning current capacity in Taiwan, the domestic interested parties identified six firms they believe to be producers of CWP in Taiwan.[98] In prior reviews, the Commission found that the CWP industry in Taiwan was export oriented and had substantial unused capacity.[99] GTA data for HTS subheading 7306.30, a category that includes CWP and may also include out-of-scope merchandise, indicate that the U.S. market became the largest export market for CWP from Taiwan in 2016, accounting for 44.4 percent of exports from Taiwan; that exports of CWP from Taiwan globally increased from 43,670 short tons in 2012 to 48,698 short tons in 2016; and that exports of CWP from Taiwan to the U.S. market increased from 3,321 short tons in 2012 to 21,633 short tons in 2016.[100] CWP from Taiwan is subject to antidumping duties in Canada.[101]

In light of the foregoing, we do not find that subject imports from Taiwan would likely have no discernible adverse impact on the domestic industry if the antidumping duty orders covering these imports were revoked.

*Thailand.* In 1984, during the original investigation, subject imports from Thailand totaled less than 500 short tons and accounted for less than 0.05 percent of apparent U.S.

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[93] The Commission's typical practice in grouped five-year reviews involving multiple orders with different scopes concerning an individual subject country is to evaluate each order separately for purposes of the no discernible adverse impact analysis. *See Carbon and Alloy Seamless Standard, Line, and Pressure Pipe from Japan and Romania*, Inv. Nos. 731-TA-847 and 849 (Third Review), USITC Pub. 4731 at 27 n.118 (Oct. 2017); *Stainless Steel Sheet and Strip from Japan, Korea, and Taiwan*, Inv. Nos. 701-TA-382 and 731-TA-800, 801, and 803, USITC Pub. 4725 at 19 (Sept. 2017). Because of the expedited nature of these reviews, data are not available on the current volume of imports subject to each of the separate orders on subject imports from Taiwan. Hence, data are presented on a country-wide, rather than order-specific, basis.

[94] CR/PR at Appendix C.

[95] CR/PR at Table I-6 and Appendix C.

[96] CR/PR at Table I-5.

[97] CR/PR at Table I-7 and Appendix C.

[98] Domestic Interested Parties' Response at Exhibit 8; CR at I-27, PR at I-21.

[99] First Five-Year Reviews, USITC Pub. 3316 at 36; Second Five-Year Reviews, USITC Pub. 3867 at 11–12; Third Five-Year Reviews, USITC Pub. 4333 at 37.

[100] CR/PR at Table I-9.

[101] CR at I-59, PR at I-43 to I-44. The record in these reviews indicates that exports of CWP from Taiwan to Australia may be subject to antidumping duties currently. *Id.*

consumption; in January–September 1985, subject imports from Thailand were 29,738 short tons and accounted for 0.7 percent of apparent U.S. consumption.[102] The level of these imports fluctuated between 28,000 and 86,000 short tons in 1998, 2001, and each year from 2005 to 2011.[103] During the current period of review, import levels decreased from 115,190 short tons in 2012 to 43,133 short tons in 2014 then increased to 58,348 short tons in 2016.[104] The share of apparent U.S. consumption represented by these imports varied between *** and *** percent in 1998, 2001, and 2005–2011 and was 4.0 percent in 2016.[105]

Although there are minimal data on the record concerning current capacity in Thailand, the domestic interested parties identified five firms they believe to be producers of CWP in Thailand.[106] In prior reviews, the Commission found that the CWP industry in Thailand was export oriented, had substantial unused capacity, and faced trade barriers in third-country markets.[107] GTA data for HTS subheading 7306.30, a category that includes CWP and may also include out-of-scope merchandise, indicate that the U.S. market was the largest export market for CWP from Thailand during each year in the current period of review and accounted for 56.9 percent of exports from Thailand in 2016; that exports of CWP from Thailand globally decreased from 160,583 short tons in 2012 to 114,414 short tons in 2016; and that exports of CWP from Thailand to the U.S. market decreased from 109,632 short tons in 2012 to 39,012 short tons in 2013 then increased steadily to 65,054 short tons in 2016.[108] CWP from Thailand is subject to antidumping duties in Canada and the European Union.[109]

In light of the foregoing, we do not find that subject imports from Thailand would likely have no discernible adverse impact on the domestic industry if the antidumping duty order covering these imports were revoked.

*Turkey.* In 1985, during the original investigations, subject imports from Turkey totaled 36,000 short tons and accounted for 1.5 percent of apparent U.S. consumption.[110] The level of these imports fluctuated between *** and *** short tons in 1998, 2001, and each year from 2005 to 2011.[111] During the current period of review, import levels increased from 67,266 short tons in 2012 to 110,562 short tons in 2015 then decreased to 50,293 short tons in

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[102] CR/PR at Appendix C; Original Determinations for Thailand and Turkey, USITC Pub. 1810 at Tables I-9, I-11.

[103] CR/PR at Table I-6 and Appendix C.

[104] CR/PR at Table I-5.

[105] CR/PR at Table I-7 and Appendix C.

[106] Domestic Interested Parties' Response at Exhibit 8; CR at I-27, PR at I-21.

[107] First Five-Year Reviews, USITC Pub. 3316 at 36; Second Five-Year Reviews, USITC Pub. 3867 at 11–12; Third Five-Year Reviews, USITC Pub. 4333 at 37.

[108] CR/PR at Table I-9.

[109] CR at I-59, PR at I-44. The record in these reviews indicates that exports of CWP from Thailand to Australia may be subject to antidumping duties currently. *Id.*

[110] CR/PR at Appendix C.

[111] CR/PR at Table I-6 and Appendix C.

2016.[112] The share of apparent U.S. consumption represented by these imports varied between *** and *** percent in 1998, 2001, and 2005–2011 and was *** percent in 2016.[113]

Although there are minimal data on the record concerning current capacity in Turkey, the domestic interested parties identified six firms they believe to be producers of CWP in Turkey.[114] In prior reviews, the Commission found that the CWP industry in Turkey was export oriented, had substantial unused capacity, and faced trade barriers in third-country markets.[115] GTA data for HTS subheading 7306.30, a category that includes CWP and may also include out-of-scope merchandise, indicate that the U.S. market was the largest export market for CWP from Turkey during each year from 2012 to 2015 and was the fourth-largest market in 2016; that exports of CWP from Turkey globally increased from 547,339 short tons in 2012 to 643,240 short tons in 2014 then declined to 541,876 short tons in 2016; and that exports of CWP from Turkey to the U.S. market decreased from 137,526 short tons in 2012 to 52,037 short tons in 2016.[116] GTA data indicate that Turkey was the third-largest global exporter of CWP (behind China and Italy) in each year of the current period of review.[117]

In light of the foregoing, we do not find that subject imports from Turkey would likely have no discernible adverse impact on the domestic industry if the countervailing or antidumping duty order covering these imports were revoked.

### 2. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.[118] Only a "reasonable overlap" of competition is required.[119] In five-year reviews, the

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[112] CR/PR at Table I-5.

[113] CR/PR at Table I-7 and Appendix C.

[114] Domestic Interested Parties' Response at Exhibit 8; CR at I-27, PR at I-21.

[115] First Five-Year Reviews, USITC Pub. 3316 at 36; Second Five-Year Reviews, USITC Pub. 3867 at 11–12; Third Five-Year Reviews, USITC Pub. 4333 at 37.

[116] CR/PR at Table I-9.

[117] CR/PR at Table I-13.

[118] The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility among subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

[119] *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int'l Trade 1996); *Wieland Werke,* 718 F. Supp. at 52 ("Completely overlapping markets are not required."); *United States Steel Group v. United States,* 873 F. Supp. 673, 685 (Ct. Int'l Trade 1994), *aff'd*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient (Continued…)

relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.[120] In each of the three prior reviews, the Commission found a likely reasonable overlap of competition among the domestic like product and subject imports from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey.[121] [122]

*Fungibility.* As in the prior reviews, CWP in these reviews is a standardized product generally made to ASTM A53, A135, A795, or similar common specifications.[123] A majority of market participants in all prior reviews that compared products from different sources found them to be at least "frequently" if not "always" interchangeable.[124] During the third five-year reviews, the majority of questionnaire respondents reported products made in each subject country "comparable" to one another and the domestic like product in terms of all but two specified factors, only reporting differences in availability and delivery time between imports from Mexico and product imported from Korea, Taiwan, Thailand, and Turkey.[125] There is no new information on the record in these reviews to indicate that the fungibility of CWP imports from different subject sources with the domestic like product or each other has changed.[126]

*Geographic Overlap.* In all prior reviews, the Commission found a likely geographic overlap on the basis that many domestic producers sold their products nationwide and

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(…Continued)
overlap in competition and has declined to cumulate subject imports. *See, e.g.*, *Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812–813 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff'd sub nom, Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int'l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761–762 (Final), USITC Pub. 3098 at 13–15 (Apr. 1998).

[120] *See generally*, *Chefline Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

[121] First Five-Year Reviews, USITC Pub. 3316 at 30; Second Five-Year Reviews, USITC Pub. 3867 at 14; Third Five-Year Reviews, USITC Pub. 4333 at 22.

[122] The domestic interested parties argue that CWP is a fungible product and that subject imports during the period of review entered the U.S. market from common ports of entry nationwide; were sold through overlapping channels of distribution, usually distributors; and were simultaneously present in the U.S. market. Domestic Interested Parties' Final Comments at 6–7.

[123] First Five-Year Reviews, USITC Pub. 3316 at 30; Second Five-Year Reviews, USITC Pub. 3867 at 14; Third Five-Year Reviews, USITC Pub. 4333 at 21; CR at I-18 to I-20, PR at I-14 to I-16.

[124] First Five-Year Reviews, USITC Pub. 3316 at 30–31; Second Five-Year Reviews, USITC Pub. 3867 at 14 and n.72; Third Five-Year Reviews, USITC Pub. 4333 at 21–22.

[125] Third Five-Year Reviews, USITC Pub. 4333 at 21–22. During the second and third five-year reviews, fewer market participants offered views concerning the comparability of subject imports from Brazil. Second Five-Year Reviews, USITC Pub. 3867 at 14 and n.72; Third Five-Year Reviews, USITC Pub. 4333 at 21–22.

[126] CR at I-18 to I-23, PR at I-14 to I-18.

importers of subject merchandise were located throughout the United States.[127] In these reviews, subject imports from six of the seven subject countries entered the United States through Texas ports (Houston-Galveston and Laredo) and at least one additional common port, except for subject imports from Brazil, which entered the United States through the Chicago port, as did subject imports from India.[128]

*Channels of Distribution.* In all prior reviews, the Commission found that CWP, regardless of source, was principally sold through distributors.[129] There is no new information on the record in these reviews to indicate that the channels of distribution have changed or are likely to do so upon revocation.

*Simultaneous Presence in Market.* As in all prior reviews, the record in these reviews showed domestic industry shipments and imports of CWP from each of the seven subject countries were in the U.S. market during each year from 2012 to 2016.[130]

*Conclusion*. The record in these expedited reviews contains very limited information concerning subject imports in the U.S. market during the period of review. There is no information suggesting a change in the market factors that led the Commission in the prior three reviews to conclude that there would be a likely reasonable overlap of competition among imports from different subject sources and between imports from each subject source and the domestic like product upon revocation. In light of this and the absence of any contrary argument, we find a likely reasonable overlap of competition among subject imports from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey and between the domestic like product and subject imports from each source.

### 3. Likely Conditions of Competition

In determining whether to exercise our discretion to cumulate the subject imports, we assess whether subject imports from the subject countries would compete under similar or different conditions in the U.S. market if the orders under review were revoked.

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[127] First Five-Year Reviews, USITC Pub. 3316 at 31; Second Five-Year Reviews, USITC Pub. 3867 at 14–15; Third Five-Year Reviews, USITC Pub. 4333 at 21–22. In the third five-year reviews, questionnaire responses and Commerce data showed that CWP manufactured in the United States, Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey served the U.S. market nationwide, despite the fact that not all subject imports entered the U.S. market in overlapping ports of entry. Third Five-Year Reviews, USITC Pub. 4333 at 21–22.

[128] CR at I-37 to I-38, PR at I-28 to I-29. Subject imports from Brazil also entered the United States through the New York port. CR at I-37, PR at I-28.

[129] CR at I-22, PR at I-17.

[130] First Five-Year Reviews, USITC Pub. 3316 at 31; Second Five-Year Reviews, USITC Pub. 3867 at 15; Third Five-Year Reviews, USITC Pub. 4333 at 22; CR/PR at Table I-5.

In the first five-year reviews, the Commission majority found that any differences in likely dumping margins, economic conditions, or export marketing patterns among the individual subject countries were outweighed by considerations supporting cumulation, particularly the commodity nature of the product and the existence of excess capacity in each subject country. It consequently did not find that any difference in likely conditions of competition was sufficient to warrant it to decline to exercise its discretion to cumulate imports from any individual subject country.[131]

In the second five-year reviews, only the Mexican respondent argued that imports from an individual subject country would likely face different conditions of competition than other subject imports. The Commission rejected this argument.[132] It also did not find any likely differences in conditions of competition among subject imports from any of the other subject countries and thus decided to exercise its discretion to cumulate subject imports from all subject countries.[133]

In the third five-year reviews, only respondents from Turkey argued that their imports would likely face different conditions of competition than other subject imports. The Commission rejected their arguments that subject imports from Turkey had maintained a limited and consistent presence in the U.S. market, that the subject industry in Turkey operated at high capacity utilization rates and that its overall production capacity fluctuated narrowly during the period of review, and that the subject industry supplied different and more attractive non-U.S. markets.[134] It also did not find any likely differences in conditions of competition among subject imports from any of the other subject countries and thus decided to exercise its discretion to cumulate subject imports from all subject countries.[135]

In these reviews, the government of Turkey argues, as it did in the third five-year reviews, that the subject industry in Turkey concentrates its sales on the Turkish domestic and regional markets instead of the U.S. market and that Turkish subject exports face no restrictive measures in any market worldwide except the U.S. market.[136]

Neither the government of Turkey nor any subject producer in Turkey provided data on domestic shipments in Turkey.[137] Although the government of Turkey reported CWP production data obtained from the Turkish Steel Pipe Manufacturers Association showing CWP production was *** tons in 2016, GTA data indicates that global exports of CWP from Turkey

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[131] First Five-Year Reviews, USITC Pub. 3316 at 31–32.

[132] Second Five-Year Reviews, USITC Pub. 3867 at 16.

[133] Second Five-Year Reviews, USITC Pub. 3867 at 15–16.

[134] Third Five-Year Reviews, USITC Pub. 4333 at 24–27.

[135] Third Five-Year Reviews, USITC Pub. 4333 at 27.

[136] Respondent Interested Party's Response at 3–6. *See* Third Five-Year Reviews, USITC Pub. 4333 at 20. The domestic interested parties argue without elaboration that the Commission, as in the prior reviews, should find that there are no differences in the likely conditions of competition between the domestic like product and any subject imports. Domestic Interested Parties' Final Comments at 7.

[137] Respondent Interested Party's Response at 10–11.

were *** short tons that year.[138] The record also reflects that the U.S. market was the largest export market for subject merchandise from Turkey during four of the five years of the period of review.[139]

The importance of the U.S. market to subject imports from Turkey was unchanged for most of the period of review despite the restraining effect of the orders in the U.S. market and the absence of trade measures in third-country markets.[140] Therefore, we find these arguments are not supported by the record and have not identified distinctions in the likely conditions of competition facing subject imports from Turkey and other subject imports.

The record in these reviews does not indicate that there would likely be any significant difference in the conditions of competition among subject imports upon revocation. Accordingly, we exercise our discretion to cumulate subject imports from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey.

### 4. Conclusion

Based on the record, we find that subject imports from each of the seven subject countries would not be likely to have no discernible adverse impact on the domestic industry were the corresponding countervailing or antidumping duty orders revoked. We also find a likely reasonable overlap of competition among the subject imports and between the subject imports and the domestic like product and that imports from each of the subject countries are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey for our analysis of whether material injury to the domestic industry is likely to continue or recur if the orders were to be revoked.

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[138] CR/PR at Table I-1 n.2 and Table I-14. Production data for the Turkish industry was undated, but presumed to be 2016. Global exports data may contain products outside the scope of these reviews and may be overstated.

[139] When comparing shipments of subject merchandise to Turkey's largest and second-largest markets during the period of review, subject exports from Turkey to the U.S. market were 137,526 short tons in 2012 (compared to 84,891 short tons for the United Kingdom), 114,482 short tons in 2013 (compared to 80,261 short tons for Iraq), 124,646 short tons in 2014 (compared to 95,133 short tons for the United Kingdom), and 107,859 short tons in 2015 (compared to 86,440 short tons for the United Kingdom). The U.S. market was the fourth-largest export destination for subject imports from Turkey in 2016 at 52,037 short tons (compared to 79,107 short tons for the United Kingdom, Turkey's top export destination that year). CR/PR at Table I-14.

[140] CR/PR at Table I-14.

## IV. Revocation of the Countervailing and Antidumping Duty Orders 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."[141] 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."[142] Thus, the likelihood standard is prospective in nature.[143] 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.[144]

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."[145] According to the SAA, a "'reasonably foreseeable time' will vary from case-to-case,

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[141] 19 U.S.C. § 1675a(a).

[142] 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.

[143] 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.

[144] *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"); *Usinor v. United States*, 26 CIT 767, 794 (2002) ("'likely' is tantamount to 'probable,' not merely 'possible'").

[145] 19 U.S.C. § 1675a(a)(5).

but normally will exceed the 'imminent' timeframe applicable in a threat of injury analysis in original investigations."[146]

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to "consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated."[147] 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).[148] 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.[149]

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.[150] 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.[151]

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

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[146] 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*.

[147] 19 U.S.C. § 1675a(a)(1).

[148] 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings with respect to the orders under review. CR at I-25, PR at I-19.

[149] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[150] 19 U.S.C. § 1675a(a)(2).

[151] 19 U.S.C. § 1675a(a)(2)(A–D).

United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.[152]

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.[153] All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.[154]

As discussed above, only the government of Turkey participated in these expedited reviews as a respondent interested party.[155] The record, therefore, contains limited new information with respect to the industries in Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey that produce CWP. There also is limited information on the CWP 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 investigations and the prior reviews and the limited new information on the record in these reviews.

### 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

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[152] *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.

[153] 19 U.S.C. § 1675a(a)(4).

[154] 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.

[155] Although the Commission unanimously determined that this response was individually adequate, the Commission found that the respondent interested party group response was inadequate. *See* section I, *supra* (explanation of Commission determination on adequacy).

"within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[156] The following conditions of competition inform our determinations.

### 1. Demand Conditions

In all prior reviews, the Commission found that demand for CWP generally depended on construction levels, particularly spending levels for nonresidential construction.[157] Both nonresidential construction spending and apparent U.S. consumption of CWP were increasing during the first reviews, whereas during the second reviews, total U.S. spending on public and private nonresidential construction, when adjusted for inflation, declined slightly and apparent U.S. consumption of CWP declined overall, although it fluctuated on an annual basis.[158] During the third reviews, following sharp declines in overall U.S. economic activity in 2008, spending on U.S. nonresidential construction declined to period lows in 2010 and 2011, and apparent U.S. consumption decreased overall from 2.4 million short tons in 2006 to 1.2 million short tons in 2009 before increasing to 1.5 million short tons in 2011.[159]

In these reviews, apparent U.S. consumption was 1.45 million short tons in 2016, which is slightly lower (1.2 percent) than in 2011 (1.5 million short tons) and notably lower (42.2 percent) than in 2001 (2.52 million short tons).[160] The domestic interested parties contend that demand during the current period of review "has remained relatively flat" and continues to depend on and track demand for downstream products such as plumbing and heating systems, air conditioning units, sprinkler systems, irrigation systems, and the low-pressure conveyance of air, steam, natural gas, water, oil, and other liquids and gases.[161]

### 2. Supply Conditions

As in all prior reviews, the domestic industry, subject imports, and nonsubject imports supplied the U.S. market with CWP during the current reviews.[162] Data collected during the first three reviews indicate that the domestic industry supplied at least half of the U.S. market during these periods, declining from 73.0 percent in 1998 to 56.0 percent in 2005 and to 51.1 percent in 2006, then increasing steadily to 71.3 percent in 2009 before declining to 65.6

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[156] 19 U.S.C. § 1675a(a)(4).

[157] First Five-Year Reviews, USITC Pub. 3316 at 32–33; Second Five-Year Reviews, USITC Pub. 3867 at 19; Third Five-Year Reviews, USITC Pub. 4333 at 29.

[158] First Five-Year Reviews, USITC Pub. 3316 at 32–33; Second Five-Year Reviews, USITC Pub. 3867 at 19.

[159] Third Five-Year Reviews, USITC Pub. 4333 at 29–30.

[160] CR/PR at Table I-7 and Appendix C. The lone purchaser to respond to the Commission's questionnaire in these reviews, ***, stated that, during the period of review, *** and that ***. CR/PR at D-4. It also states that there has been a *** during the period of review. *Id.* at D-5.

[161] Domestic Interested Parties' Response at 13, 22.

[162] Third Five-Year Reviews, USITC Pub. 4333 at 30; CR/PR at Table I-7.

percent in 2010 and 2011.[163] The varied share of the U.S. market held by subject imports and nonsubject imports during these periods was affected by the revocation of the order on subject imports from Venezuela in 2000 and the issuance of antidumping and countervailing duty orders covering CWP imports from China in 2008.[164] The market share of subject imports was 9.4 percent in 1998 and 7.5 percent in 2005 and increased from *** percent in 2006 to *** percent in 2008 before declining to *** percent in 2011.[165] The market share of nonsubject imports was 17.7 percent in 1998 and 36.5 percent in 2005 and decreased from *** percent in 2006 to *** percent in 2009 before increasing to *** percent in 2011.[166]

The Commission observed during the third reviews that the composition of the domestic industry had changed since the original investigations due to new entrants, consolidations, and closures that affected the types of production facilities (fully integrated versus non- or partially integrated) manufacturing CWP.[167] Commission reports in the original investigations and prior reviews identified about two dozen U.S. CWP producers in 1986, 21 producers in 1992, 25 producers in 1998, 20 producers in 2005, and 17 producers in 2011.[168]

The Commission found in prior reviews that some CWP producers in the United States and in the subject countries manufacture other products using the same manufacturing equipment and employees.[169] Depending on changes in market demand, they had some ability to shift production among products, including small/medium line pipe, large-diameter line pipe, mechanical tubing, oil country tubular goods, and such other products as square and rectangular structural tubing, electrical conduit, slurry pipe, coupling stock, and strut.[170] In most of the years for which data were collected in the prior reviews, the domestic industry's capacity to produce CWP approached or exceeded apparent U.S. consumption.[171]

Although domestic producers were the largest source of supply to the U.S. market in 2016, their share of apparent U.S. consumption was 46.2 percent, which was lower than in any prior review.[172] In these reviews, the domestic interested parties contend that there have been no significant developments affecting domestic supply during the period of review. They state

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[163] CR at Tables I-5 to I-7 and Appendix C.

[164] CR at Table I-2.

[165] CR at Tables I-5 to I-7 and Appendix C.

[166] CR at Tables I-5 to I-7 and Appendix C.

[167] Third Five-Year Reviews, USITC Pub. 4333 at 31.

[168] First Five-Year Reviews, USITC Pub. 3316 at Table CIRC-I-4; Second Five-Year Reviews, USITC Pub. 3867 at Table CIRCULAR-I-11; Third Five-Year Reviews, USITC Pub. 4333 at Table I-13.

[169] Second Five-Year Reviews, USITC Pub. 3867 at 20; Third Five-Year Reviews, USITC Pub. 4333 at 32.

[170] Third Five-Year Reviews, USITC Pub. 4333 at 32–33.

[171] CR at Tables I-5 to I-7 and Appendix C.

[172] Domestic producers' share of apparent U.S. consumption was *** percent in 2011, *** percent in 2010, *** percent in 2009, *** percent in 2008, *** percent in 2007, *** percent in 2006, *** percent in 2005, *** percent in 2001, and 73.0 percent in 1998. CR/PR at Table I-7 and Appendix C.

that, in addition to the four domestic producers participating in these reviews, there are four other producers of CWP in the United States.[173]

Subject imports' share of the U.S. market was *** percent in 2016, which was higher than any year during the prior reviews but for one year.[174] Nonsubject imports' share of the U.S. market was *** percent in 2016, which was higher than in most years during the prior reviews.[175]

### 3. Substitutability and Other Conditions

In all prior reviews, the Commission found CWP, regardless of source, to be a standardized product generally made to ASTM standards.[176] Market participants generally reported that CWP, whether imported or produced in the United States, was at least "frequently" if not "always" interchangeable, could be used for the same applications, and was comparable in most nonprice characteristics.[177] Furthermore, the Commission found in all prior reviews that price is an important factor in purchasing decisions for CWP in the U.S. market.[178] In view of the importance of price in purchasing decisions and the high substitutability of the products, the Commission found the U.S. CWP market to be price competitive.[179]

The information in these expedited reviews contains nothing to indicate that the substitutability between domestically produced CWP and subject imports regardless of source

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[173] The four other producers are California Steel Industries; Maruichi American Corp.; Maruichi Levitt Pipe and Tube, LLC; and U.S. Steel. Domestic Interested Parties' Response at 20. The domestic interested parties state that, during the current period of review, there has been consolidation and closure of domestic producers, including the idling of a Pennsylvania facility in 2015 by Wheatland Tube, the announcement in October 2015 of the end of production by Allied Tube and Conduit of certain CWP at its Pennsylvania and Arizona facilities, and the February 2017 completion by Zekelman Industries of its acquisition of Western Tube and Conduit Corporation. Domestic Interested Parties' Response at 13–14; Domestic Interested Parties' Final Comments at 3–4.

[174] Subject imports' share of the U.S. market was *** percent in 2011, *** percent in 2010, *** percent in 2009, *** percent in 2008, *** percent in 2007, *** percent in 2006, 7.5 percent in 2005, *** percent in 2001, and 9.4 percent in 1998. CR/PR at Table I-6 and Appendix C.

[175] Nonsubject imports' share of the U.S. market was *** percent in 2011, *** percent in 2010, *** percent in 2009, *** percent in 2008, *** percent in 2007, *** percent in 2006, 36.5 percent in 2005, 21.9 percent in 2001, and 17.7 percent in 1998. CR/PR at Table I-6 and Appendix C.

[176] First Five-Year Reviews, USITC Pub. 3316 at 30 and 32–33; Second Five-Year Reviews, USITC Pub. 3867 at 14 and 21; Third Five-Year Reviews, USITC Pub. 4333 at 34.

[177] First Five-Year Reviews, USITC Pub. 3316 at 33; Second Five-Year Reviews, USITC Pub. 3867 at 21; Third Five-Year Reviews, USITC Pub. 4333 at 34.

[178] First Five-Year Reviews, USITC Pub. 3316 at 37; Second Five-Year Reviews, USITC Pub. 3867 at 12, 13, and 23–25; Third Five-Year Reviews, USITC Pub. 4333 at 34.

[179] First Five-Year Reviews, USITC Pub. 3316 at 32, 37; Second Five-Year Reviews, USITC Pub. 3867 at 12, 24; Third Five-Year Reviews, USITC Pub. 4333 at 17, 34.

or the importance of price has changed since the prior reviews.[180] Accordingly, we again find that the domestic like product and subject imports are highly substitutable and that price is an important factor in purchasing decisions. In addition, we observe the presence of various import restraints against exports of CWP from India, Korea, Taiwan, and Thailand worldwide.[181]

### C. Likely Volume of Subject Imports

#### 1. The Prior Proceedings

The Commission's analysis of subject import volume differed slightly in each of the original investigations. In the 1984 investigation, the Commission focused on volume and market share increases by the subject imports.[182] In the 1986 antidumping and countervailing duty investigations concerning CWP from Turkey and Thailand, the two Commissioners who made affirmative present material injury determinations focused on increases in the volume and market share of subject imports.[183] The two Commissioners making affirmative threat determinations noted that, although subject producers had a small market share, they had increased their market share substantially, had the ability to shift production between various tubular products, and, in the case of Turkey, had substantial underutilized capacity.[184] In the 1986 antidumping duty investigations concerning CWP from India, Taiwan, and Turkey, the Commission emphasized subject imports' dramatic increases in market share.[185] In the 1992 investigations, the Commission based its volume analysis on the absolute and relative increases in cumulated subject imports.[186]

In the first five-year reviews, the Commission majority found that the orders had restrained subject imports.[187] It concluded that if the orders were revoked, the likely volume of subject imports would be significant both in absolute terms and relative to U.S. consumption.[188] It based this conclusion on significant unused capacity in the subject countries; the ability of several subject producers to switch production from other tubular products to CWP; the attractiveness of the large, growing U.S. market; and subject producers' demonstrated ability to increase U.S. market share rapidly.[189]

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[180] Domestic Interested Parties' Response at 14; Domestic Interested Parties' Final Comments at 4; CR at I-18 to I-23, PR at I-14 to I-18.

[181] CR at I-58 to I-60, PR at I-43 to I-44.

[182] Original Determination for Taiwan, USITC Pub. 1519 at 14.

[183] Original Determinations for Turkey and Thailand, USITC Pub. 1810 at 15–16, 21. These two Commissioners' volume analyses shared this common rationale although each examined different combinations of subject imports due to divergent cumulation decisions.

[184] Original Determinations for Turkey and Thailand, USITC Pub. 1810 at 25–28.

[185] Original Determinations for India and Turkey, USITC Pub. 1839 at 12–13.

[186] Original Determinations for Brazil, Korea, Mexico, and Taiwan, USITC Pub. 2564 at 34–35.

[187] First Five-Year Reviews, USITC Pub. 3316 at 34.

[188] First Five-Year Reviews, USITC Pub. 3316 at 36.

[189] First Five-Year Reviews, USITC Pub. 3316 at 34–36.

In the second five-year reviews, the Commission based its finding on the restraining effect of the orders, including responses by several foreign producers in questionnaires that the orders had precluded them from participating in the U.S. market or that they would increase U.S. shipments if the orders were revoked.[190] Although CWP inventories in the subject countries were generally stable, the Commission found that revoking the orders would provide incentives for subject producers to use what it found to be substantial excess capacity to increase their U.S. exports, particularly given that producers in most of the subject countries faced antidumping duty orders in one or more of their major non-U.S. markets.[191] Given the large amount of unused CWP capacity, which the Commission found was likely understated due to the failure of numerous firms to submit data, and the subject producers' ability in the original investigations to increase imports rapidly, it found that the likely volume of cumulated subject imports in the event of revocation would be significant absolutely and relative to U.S. consumption.[192]

In the third five-year reviews, the Commission found that the orders served to restrain subject import volumes and that subject imports would increase upon their revocation.[193] The Commission concluded that revocation of the orders would provide an incentive for the subject producers, many of which already had existing customers or sales networks in the United States, to use their excess production capacity or their existing foreign inventories of subject CWP to increase their exports to the United States.[194] The Commission added that because subject producers in several of the subject countries faced orders or investigations of their CWP exports to one or more of their non-U.S. export markets, revocation of the orders would provide further incentive for them to direct additional shipments to the large U.S. market.[195] Given the large amount of unused capacity and the subject producers' ability to increase imports rapidly during the period of review in the third five-year reviews as imports from China exited the U.S. market due to the issuance of antidumping and countervailing duty orders, the Commission found that if the orders under review were revoked, the likely volume of cumulated subject imports would be significant in absolute terms and relative to consumption in the United States.[196]

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[190] Second Five-Year Reviews, USITC Pub. 3867 at 23.

[191] Second Five-Year Reviews, USITC Pub. 3867 at 22–23.

[192] Second Five-Year Reviews, USITC Pub. 3867 at 23–24 (noting that some subject producers had the ability to shift production from other products to CWP but explaining that it did not rely on this in making its affirmative determinations).

[193] Third Five-Year Reviews, USITC Pub. 4333 at 38.

[194] Third Five-Year Reviews, USITC Pub. 4333 at 36–38.

[195] Third Five-Year Reviews, USITC Pub. 4333 at 37.

[196] Third Five-Year Reviews, USITC Pub. 4333 at 36 and 38. The Commission stated that it did not rely on product shifting as a basis for finding that significant quantities of subject imports were likely upon revocation of the orders. *Id.* at 37.

### 2. The Current Reviews

In these reviews, we find that the volume of subject imports would likely be significant in the event of revocation. Despite the countervailing and antidumping duty orders, subject imports continued to enter the U.S. market in substantial quantities during the current period of review. From 2012 to 2016, the quantity of subject imports ranged from a low of *** short tons in 2014 to a high of *** short tons the next year.[197] The share of the U.S. market held by subject imports was *** percent in 2016, an increase from the *** percent market share held at the end of the previous period of review.[198]

The record contains limited data concerning the CWP industries in Brazil, India, Korea, Mexico, Taiwan, and Thailand because no foreign producer or exporter of subject merchandise from these countries participated in these reviews; the government of Turkey provided only partial data concerning the CWP industry in Turkey. The available information indicates that each of the subject countries has substantial capacity and unused capacity, with the most recent reported data indicating that subject producers had *** short tons of CWP production capacity in 2011, equivalent to *** percent of domestic production in that year.[199] These subject producers collectively operated at *** percent capacity utilization in 2011, and their collective unused CWP capacity in 2011 was *** short tons, equivalent to *** percent of domestic production in that year.[200] Each of these figures was seriously understated because, of the subject producers in the seven cumulated subject countries, only five producers in three countries submitted complete questionnaire data.[201] Consequently, subject CWP producers will likely have the ability to increase shipments of subject merchandise significantly to the United States should the orders be revoked.

The information available also indicates that the CWP industries in the subject countries remain export oriented. GTA data show that the subject producers continue to export

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[197] CR/PR at Table I-5.

[198] CR/PR at Table I-6 and Appendix C (2011 data).

[199] Third Five-Year Reviews, USITC Pub. 4333 at 36; Confidential Third Five-Year Review Determinations, EDIS Doc. 619212 at 49.

[200] Third Five-Year Reviews, USITC Pub. 4333 at 36; Confidential Third Five-Year Review Determinations at 49.

[201] One CWP producer in Mexico, one in Thailand, and three in Turkey submitted complete questionnaire data. A producer in Taiwan submitted incomplete data, and no information was received from subject producers in Brazil, India, and Korea. Third Five-Year Reviews, USITC Pub. 4333 at 36.

The information available indicates that the subject producers possess the ability to shift exports readily among certain forms of pipe, including CWP, although we do not rely on product shifting as a basis for finding that significant quantities of subject imports are likely upon revocation of the orders due to the unavailability of data in these expedited reviews. We note that line pipe and OCTG are among the principal other products produced. *See* Second Five-Year Reviews, USITC Pub. 3867 at 23–24; Third Five-Year Reviews, USITC Pub. 4333 at 37.

significant volumes of CWP[202] and that India, Korea, and Turkey are among the top 10 exporters of CWP globally.[203] In addition, the United States was the single-largest export market for CWP from Korea, Mexico, Taiwan, and Thailand in 2016.[204] The United States remains an attractive market to the CWP industries in the subject countries. The subject countries have demonstrated an ongoing interest in serving the United States throughout the period of review. Indeed, subject imports were present in the U.S. market in each year of the period of review despite the restraining effects of the orders.[205] Moreover, the information available indicates that there are antidumping duty measures on CWP from Thailand currently in place in Australia and the European Union and on CWP from India, Korea, Taiwan, and Thailand currently in place in Canada.[206] These actions provide additional incentive for subject producers to target the United States should the orders be revoked.[207]

Based on the information available in these expedited reviews, in particular the substantial presence of subject imports in the U.S. market even under the discipline of the orders; the size of the industries in the subject countries, their excess capacity, and their export orientation; the attractiveness of the U.S. market; and restrictions on the subject countries' exports in various third-country markets, we find that subject producers would likely increase their exports to the United States if the countervailing and antidumping duty orders were to be revoked. Accordingly, we conclude that the volume of subject imports would likely be significant, both in absolute terms and relative to U.S. consumption, should the orders be revoked.

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[202] CR/PR at Tables I-8 (Brazil), I-9 (India), I-10 (Korea), I-11 (Mexico), I-12 (Taiwan), I-13 (Thailand), and I-14 (Turkey). GTA data show that Turkey and Korea were the largest exporters of subject merchandise during the period of review. *Id.* at Tables I-10, I-14. GTA data on the subject countries' global exports are classifiable in HS 7306.30, a broader commodity category than subject CWP and thus may be overinclusive. *See* CR/PR at Tables I-8 to I-14 and notes.

[203] Turkey was the third-largest and Korea was the fourth-largest exporter of CWP globally over the period of review. CR/PR at Table I-15.

[204] CR/PR at Tables I-10 (Korea), I-11 (Mexico), I-12 (Taiwan), and I-13 (Thailand).

[205] CR/PR at Table I-5.

[206] CR at I-58 to I-60, PR at I-43 to I-44.

[207] Because of the expedited nature of these reviews, the record does not contain information about inventories of the subject merchandise.

## D. Likely Price Effects

### 1. The Prior Proceedings

In each of the original determinations, the Commission centered its price effects analysis on pervasive underselling by the subject imports.[208] In several of the determinations, the Commission also found that the subject imports had significant price-depressing effects.[209]

In the first five-year reviews, the Commission characterized CWP as a price-sensitive product.[210] Because CWP from various sources was generally interchangeable, price was important in purchasing decisions.[211] The Commission observed that should the orders be revoked, there would likely be pervasive underselling by the subject imports, based on pricing patterns observed during both the original investigations and the period of review.[212] Because the market for CWP was price sensitive, it found that the addition of even relatively small amounts of additional subject imports upon revocation would be likely to have significant price-depressing or -suppressing effects.[213]

In the second five-year reviews, the Commission found that price continued to be critical to purchasing decisions and that the presence of likely significant U.S. CWP imports after revocation of the orders that were likely to undersell the domestically produced product would force domestic producers to lower prices or lose sales.[214] It found domestic producers' raw material costs to be volatile.[215] It found the addition of significant quantities of low-priced subject imports would likely impair the domestic industry's ability to recover increased costs should these costs continue to rise as they did during the bulk of the period of review during the second five-year reviews.[216] In light of these considerations and the price-sensitive nature of CWP, the Commission concluded that cumulated subject imports would likely have price-depressing or -suppressing effects were the orders to be revoked.[217]

In the third five-year reviews, the Commission found that price continued to be an important factor in purchasing decisions for CWP in the U.S. market given the general

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[208] Original Determination for Taiwan, USITC Pub. 1519 at 15–16; Original Determinations for Turkey and Thailand, USITC Pub. 1810 at 16, 22, and 25–26; Original Determinations for India and Turkey, USITC Pub. 1839 at 13–14; Original Determinations for Brazil, Korea, Mexico, and Taiwan, USITC Pub. 2564 at 36–37.

[209] Original Determinations for Turkey and Thailand, USITC Pub. 1810 at 16 and 22; Original Determinations for India and Turkey, USITC Pub. 1839 at 13–14; Original Determinations for Brazil, Korea, Mexico, and Taiwan, USITC Pub. 2564 at 36–37.

[210] First Five-Year Reviews, USITC Pub. 3316 at 37.

[211] First Five-Year Reviews, USITC Pub. 3316 at 37.

[212] First Five-Year Reviews, USITC Pub. 3316 at 37.

[213] First Five-Year Reviews, USITC Pub. 3316 at 37.

[214] Second Five-Year Reviews, USITC Pub. 3867 at 24–25.

[215] Second Five-Year Reviews, USITC Pub. 3867 at 25.

[216] Second Five-Year Reviews, USITC Pub. 3867 at 25.

[217] Second Five-Year Reviews, USITC Pub. 3867 at 25.

interchangeability of subject imports and domestically produced CWP.[218] Because the U.S. CWP market remained price sensitive, the Commission reaffirmed its finding from the prior reviews that sustained underselling by even a relatively small amount of subject imports would be likely to depress or suppress prices of the domestic like product to a significant degree.[219] Given the subject producers' demonstrated interest in the U.S. market during the original investigations and the continued presence of cumulated subject imports in the U.S. market after imposition of the orders at prices below those for the domestic like product, the Commission found that the subject producers were likely to find the large U.S. market attractive and that there would likely be significant price underselling should the orders be revoked.[220] Because the likely significant volume of low-priced subject imports upon revocation would force the domestic industry to lower prices, limit price increases, or lose sales in this price-sensitive market, the Commission concluded that the increased cumulated subject imports likely would have significant price-depressing or -suppressing effects.[221]

### 1. The Current Reviews

For purposes of these reviews, we again find a high degree of substitutability between the domestic like product and subject imports, and price continues to be an important factor in purchasing decisions. The record does not contain new pricing data due to the expedited nature of these reviews.[222] As observed above, subject import volumes would likely increase significantly upon revocation of the orders. Additionally, given the continued attractiveness of the U.S. market, subject producers would be likely to resume the behavior observed in the original investigations, exporting subject merchandise at low prices to gain market share. These subject imports would likely undersell domestically produced CWP, as they did during the original investigations. Consequently, there would likely be significant underselling by subject imports. The likely significant volume of subject imports, which would undersell the domestic like product, would likely force the domestic industry to lower prices or lose sales.

In light of these considerations, we conclude that subject imports would likely have significant depressing or suppressing effects on prices for the domestic like product upon revocation of the orders.

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[218] Third Five-Year Reviews, USITC Pub. 4333 at 39.

[219] Third Five-Year Reviews, USITC Pub. 4333 at 40.

[220] Third Five-Year Reviews, USITC Pub. 4333 at 40. Cumulated subject imports undersold the domestic like product in 452 of 492 quarterly observations during the third period of review. *Id*.

[221] Third Five-Year Reviews, USITC Pub. 4333 at 40.

[222] We observe that the available average unit value ("AUV") data indicate that the AUV for subject merchandise was $*** per short ton in 2016, *** percent lower than the AUV for domestic producers' domestic shipments for that year ($***). CR/PR at Tables I-4, I-5. We typically view AUV data with caution for price comparisons because differences in AUVs can reflect differences in product mix rather than differences in price.

## E. Likely Impact

### 1. The Prior Proceedings

In each of the original determinations, the Commission's impact analysis focused on the poor operating performance of the domestic CWP industry.[223] Other factors the Commission cited in individual original determinations included declines in production, shipments, and employment (in the 1984 Taiwan investigation), declines in market share and employment (in both 1986 determinations), and declines in employment and capacity utilization (in the 1992 investigations).[224]

In the first five-year reviews, the Commission found that the industry's condition had improved markedly since the original investigations, due to the existence of the orders and the recent increases in demand for construction materials.[225] Although the domestic industry's operating performance had declined during that period of review, it was consistently better than during the original investigations.[226] The Commission did not find the domestic industry to be vulnerable, but it concluded that if the orders were revoked, the adverse price effects associated with increased subject imports would likely have a significant impact on the domestic industry.[227]

In the second five-year reviews, the Commission did not find the domestic industry to be vulnerable to material injury but concluded that subject imports would likely increase to significant levels if the orders were revoked.[228] Because the subject imports were good substitutes for the domestic like product, the domestic industry supplied the majority of the U.S. market, and there appeared to be no significant market segments in which the domestic industry participated exclusively, the Commission found that any increase in subject import volumes would likely be in substantial part at the domestic industry's expense.[229] Additionally, because of the likely aggressive pricing of the subject imports, the Commission found that the domestic industry would need to cut prices for the domestic like product or lose sales.[230] Under either scenario, it found that the domestic industry's revenues would likely decline significantly

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[223] Original Determination for Taiwan, USITC Pub. 1519 at 7–8; Original Determinations for Turkey and Thailand, USITC Pub. 1810 at 8–9; Original Determinations for India and Turkey, USITC Pub. 1839 at 7–9; Original Determinations for Brazil, Korea, Mexico, and Taiwan, USITC Pub. 2564 at 36–37.

[224] Original Determination for Taiwan, USITC Pub. 1519 at 7–8; Original Determinations for Turkey and Thailand, USITC Pub. 1810 at 8–9; Original Determinations for India and Turkey, USITC Pub. 1839 at 7–9; Original Determinations for Brazil, Korea, Mexico, and Taiwan, USITC Pub. 2564 at 36–37.

[225] First Five-Year Reviews, USITC Pub. 3316 at 38.

[226] First Five-Year Reviews, USITC Pub. 3316 at 38.

[227] First Five-Year Reviews, USITC Pub. 3316 at 38.

[228] Second Five-Year Reviews, USITC Pub. 3867 at 27.

[229] Second Five-Year Reviews, USITC Pub. 3867 at 27.

[230] Second Five-Year Reviews, USITC Pub. 3867 at 27.

in light of the anticipated volume of subject imports and that its operating performance would deteriorate.[231]

In the third five-year reviews, the Commission examined performance indicators for the domestic industry as a whole while acknowledging that the industry consisted of a variety of firms that differed in size, product mix, cost methodologies, and the extent to which they manufactured products other than CWP.[232] The Commission observed that many of the domestic industry's performance indicators, such as capacity, production, and U.S. shipments, declined overall between 2006 and 2011, peaking earlier in the period and not recovering to earlier levels by the end of the period.[233] The domestic industry's net sales, operating income, and ratio of operating income to net sales followed the same trend during the period of review.[234] The Commission found that the likely increase in cumulated subject imports would be substantially at the expense of the domestic industry, which supplied the majority of the U.S. market. It further concluded that if the orders were revoked, the adverse price effects associated with increased subject imports would likely have a significant impact on the domestic industry.[235] The Commission noted that the presence of nonsubject imports in the U.S. market would not sever the likely causal nexus between the likely significant volume of low-priced subject imports and likely adverse impact on the domestic industry were the orders under review to be revoked, citing the decline in market share of nonsubject imports and the lower AUVs for cumulated subject imports than for nonsubject imports.[236]

### 2. The Current Reviews

In these expedited reviews, the information available on the domestic industry's condition is limited. In 2016, the domestic industry's production capacity was *** short tons, its production was *** short tons, and its capacity utilization rate was *** percent.[237] The industry's domestic shipments were *** short tons, accounting for *** percent of apparent

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[231] Second Five-Year Reviews, USITC Pub. 3867 at 27.

[232] Third Five-Year Reviews, USITC Pub. 4333 at 43.

[233] Third Five-Year Reviews, USITC Pub. 4333 at 43 and n.278. The domestic industry's share of apparent U.S. consumption increased overall, but was lower in 2011 than its peak in 2009. Third Five-Year Reviews, USITC Pub. 4333 at 43.

[234] Third Five-Year Reviews, USITC Pub. 4333 at 44.

[235] Third Five-Year Reviews, USITC Pub. 4333 at 45. Three Commissioners found the domestic industry to be vulnerable, and three Commissioners did not find the industry to be vulnerable. *Id.* at 44–45, nn.288–289.

[236] Third Five-Year Reviews, USITC Pub. 4333 at 38, n.249.

[237] CR/PR at Tables I-4, I-6. The domestic industry's capacity was 3.0 million short tons in 1998 and 2.6 million short tons in 2005 and declined slightly from 2.09 million short tons in 2006 to 2.05 million short tons in 2011. CR at Table I-4 and Appendix C. Similarly, its production in 2016 was lower than in 2011, when it was *** short tons. CR/PR at Table I-4. Its capacity utilization rate was 73.3 percent in 1998 and 50.9 percent in 2005 and declined irregularly from 61.4 percent in 2006 to 49.8 percent in 2011. CR at Table I-4 and Appendix C.

U.S. consumption by volume and *** percent by value.[238] Its net sales value was $***, and its operating income was $***, equivalent to *** percent of net sales.[239] The limited evidence in these expedited reviews is insufficient for us to make a finding on whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

Based on the information available in these reviews, we find that revocation of the orders would likely lead to a significant volume of subject imports and that these imports would likely undersell the domestic like product to a significant degree, resulting in significant price depression or suppression for the domestic like product. We find that the increased subject import competition that would likely occur after revocation of the orders would likely have a significant impact on the domestic industry. The domestic industry would likely lose market share to subject imports and/or experience lower prices due to competition from subject imports, which would adversely impact its production, shipments, sales, and revenue. These reductions would likely have a direct adverse impact on the domestic industry's profitability and employment levels, 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 likely injury from other factors to the subject imports. Although nonsubject imports' market share was higher in 2016 (34.9 percent) than in 2011 (19.4 percent), subject imports' market share also increased from 2011 to 2016.[240] Thus, there is no indication on the record that the presence of nonsubject imports would prevent cumulated subject imports from entering the U.S. market in significant quantities upon revocation of the orders. Given the high degree of substitutability of CWP from different sources, the fact that the domestic industry is currently the largest supplier to the U.S. market, and the increase in cumulated subject imports' market share since the last five-year reviews despite the restraining effects of the orders, any increase in cumulated subject import volume and market penetration is likely to come, at least in substantial proportion, at the expense of the domestic industry. In light of these considerations, we find that the effects we have attributed to the subject imports are distinguishable from any effects likely from nonsubject imports in the event of revocation.

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[238] CR/PR at Tables I-4, I-7. Domestic producers' U.S. shipments were *** short tons in 1998, *** short tons in 2001, *** short tons in 2005, *** short tons in 2006, *** short tons in 2007, *** short tons in 2008, *** short tons in 2009, *** short tons in 2010, and *** short tons in 2011. CR/PR at Table I-6 and Appendix C. The AUV of the domestic industry's U.S. commercial shipments in 2016 ($*** per short ton) was lower than in 2011 ($*** per short ton). CR/PR at Table I-4.

[239] CR/PR at Table I-4. Although the domestic industry's net sales in 2016 were lower than during the third review ($*** in 2011), operating income was higher ($*** in 2011), and the ratio of operating income to net sales was also higher (*** percent in 2011). *Id*.

[240] CR/PR at Table I-7. Cumulated subject imports' market share was *** percent in 2011 and *** percent in 2016. *Id*.

Accordingly, we conclude that, if the orders were to be revoked, subject imports would likely have a significant impact on domestic producers of CWP within a reasonably foreseeable time.

## V. Conclusion

For the reasons above, we determine that revocation of the countervailing duty order on imports of CWP from Turkey and the antidumping duty orders on CWP from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey 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 THESE REVIEWS

## BACKGROUND

On June 1, 2017, 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 countervailing duty order on circular welded pipe and tube ("CWP") from Turkey and the antidumping duty orders on CWP from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey would likely lead to the continuation or recurrence of material injury to a domestic industry.[2] All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.[3] [4] The following tabulation presents information relating to the background and schedule of this proceeding:

| Effective or statutory date | Action |
|---|---|
| June 1, 2017 | Notice of initiation and institution by Commerce and Commission |
| September 5, 2017 | Commission vote on adequacy |
| September 29, 2017 | Commerce results of its expedited review |
| October 30, 2017 | Commission statutory deadline to complete expedited review |
| May 29, 2018 | Commission statutory deadline to complete full review |

## RESPONSES TO THE COMMISSION'S NOTICE OF INSTITUTION

### Individual responses

The Commission received two submissions in response to its notice of institution in the subject review(s). They were filed on behalf of the following entities:

[1] 19 U.S.C. 1675(c).

[2] *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand and Turkey; Institution of a Five-Year Review*, 82 FR 25328, June 1, 2017. In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of a five-year review of the subject antidumping duty order concurrently with the Commission's notice of institution. *Initiation of Five-Year ("Sunset") Review*, 82 FR 25599, June 2, 2017. Pertinent *Federal Register* notices are referenced in app. A, and may be found at the Commission's website (www.usitc.gov).

[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 prior proceedings is 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 subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in the adequacy phase of this review.

1. Bull Moose Tube Company ("Bull Moose"), EXLTUBE, TMK IPSCO Tubulars ("TMK"), and Zekelman Industries ("Zekelman"), domestic producers of circular welded pipe and tube (collectively referred to herein as "domestic interested parties");

2. Government of Turkey ("GOT").

A complete response to the Commission's notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy and explain any deficiencies in their responses. A summary of the number of responses and estimates of coverage for each is shown in table I-1.

**Table I-1**
**CWP: Summary of responses to the Commission's notice of institution**

| Type of interested party | Completed responses | |
|---|---|---|
| | Number | Coverage |
| Domestic: | | |
| U.S. producer | 1 | ***%[1] |
| Respondent: | | |
| Foreign government | 1 | ([2]) |

[1] In their response to the notice of institution, domestic interested parties estimated that they accounted for this share of total U.S. production of CWP during 2016. Domestic interested parties have based their computation on 2015 total domestic production data. Domestic Interested Parties' Response to the Notice of Institution, July 3, 2017, p. 22.

[2] In its response to the notice of institution, the GOT reported capacity of all firms in Turkey to produce welded carbon steel pipe and tube is *** tons, while production of welded carbon steel pipe and tube in Turkey was *** tons, which accounted for *** percent of total production of welded steel pipe in Turkey. The data provided in the GOT's response to the notice of institution was obtained from Turkish Steel Pipe Manufacturers Association. GOT's Cure Response to the Notice of Institution, July 21, 2017.

## Party comments on adequacy

The Commission received one submission from parties commenting on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews. This submission was filed on behalf of the following entities: (1) Bull Moose Tube Company, (2) EXLTUBE, (3) TMK IPSCO Tubulars, and (4) Zekelman Industries.[5]

Domestic interested parties argue that the Commission should find the GOT Response is individually inadequate and that it represents an inadequate portion of the respondent interested parties subject to these reviews.[6] Therefore, because of the inadequate response by the respondent interested parties and the fact that there have been no major changes in the conditions of competition in the market since the Commission's last five-year reviews, they request that the Commission conduct expedited reviews of the antidumping and/or countervailing duty orders on CWP.

[5] Domestic Interested Parties' Comments on Adequacy, August 14, 2017, pp. 1-2.

[6] Domestic Interested Parties' Comments on Adequacy pp. 1-2.

## RECENT DEVELOPMENTS IN THE INDUSTRY

Since the Commission's last five-year reviews, the following developments have occurred in the CWP industry:

| Year | Company | Event |
|---|---|---|
| 2012 | Leavitt Tube Company | **Name change: The** Leavitt Tube Company announced that it would be renamed to Maruichi Leavitt Pipe & Tube, LLC after Maruichi Steel Tube Ltd acquired a 60-percent stake in the company. |
| 2013 | TMK IPSCO | **Acquisition:** TMK IPSCO acquired the pipe services and precision manufacturing assets of ITS Tubular Services Limited. The acquisition included a manufacturing facility located near Houston, Texas. |
| 2014 | TMK IPSCO | **Production reduction:** TMK IPSCO announced that it would reduce the number of operating hours to produce welded pipe at its facilities in Blytheville, Arkansas; Camanche, Iowa; and Wilder, Kentucky by 30 percent.<br>**New labor agreement:** TMK IPSCO announced that it reached an agreement with union members at its Koppel and Ambridge, Pennsylvania facilities. The agreement is expected to remain in effect through November 1, 2018. |
| 2015 | Wheatland Tube Co. | **Furlough/operations idled**: Wheatland Tube Co. announced that it would indefinitely idle its Sharon, Pennsylvania hot mill operations and lay off 100 workers. |
| | Allied Tube & Conduit Corporation | **Closure:** Allied Tube & Conduit Corporation announced that it would cease production of steel fence framework and sprinkler pipe products as of October 5, 2015, and permanently exit these markets. The company planned to close its Philadelphia, Pennsylvania operations after transferring remaining production to other facilities owned by its parent company, Atkore International Group Inc. The company also announced that it would close operations at its facilities in Harvey, Illinois and Phoenix, Arizona. These actions were expected to result in 317 positions being eliminated nationwide. |
| 2016 | Zekelman Industries Inc. | **Name change:** JMC Steel Group changed its name to Zekelman Industries Inc.<br>**Acquisition:** Zekelman entered into a definitive agreement to purchase Western Tube and Conduit Corporation. |
| 2017 | Zekelman Industries Inc./American Tube Manufacturing Inc. | **Acquisition:** Zekelman Industries acquired American Tube Manufacturing, Inc. |

Sources: Steel Market Update, "Leavitt Tube has been Renamed Maruichi Leavitt Pipe & Tube," July 2, 2012, https://www.steelmarketupdate.com/blog/1296-leavitt-tube-has-been-renamed-maruichi-leavitt-pipe--tube, (accessed July 24, 2017); TMK IPSCO, "TMK Acquires Pipe Services Assets in Houston," April 8, 2013, https://tmk-ipsco.tmk-group.com/tmk_ipsco_press_releases/show/847, (accessed July 24, 2017); TMK IPSCO, "TMK IPSCO to Reduce Operating Hours at Three Welded Pipe Facilities," April 7, 2014, https://tmk-ipsco.tmk-group.com/tmk_ipsco_press_releases/show/889, (accessed July 24, 2017); TMK IPSCO, "TMK IPSCO's

Koppel and Ambridge, Pennsylvania Plants Ratify New Labor Agreement," June 23, 2014, https://tmk-ipsco.tmk-group.com/tmk_ipsco_press_releases/show/908, (accessed July 24, 2017); The Herald, "100 Furloughed at Wheatland Tube," June 27, 2015, http://www.sharonherald.com/news/furloughed-at-wheatland-tube/article_402e35f4-d70b-50f3-9053-36fbbaa285c3.html, (accessed July 24, 2017); Bloomberg, "Allied Tube & Conduit Corporation to Cease Manufacturing of Steel Fence Framework and Sprinkler Pipe Products, Effective October 5, 2015," August 6, 2015, https://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=237388919, (accessed July 24, 2017); Wheatland Tube, "JMC Steel Group Changes Name to Zekelman Industries Inc." June 6, 2016, http://www.wheatland.com/press-releases/jmc-steel-group-changes-name-to-zekelman-industries-inc, (accessed July 16, 2017); Zekelman Industries, "Zekelman Industries to Acquire Western Tube and Conduit Corporation," December 6, 2016, http://www.zekelman.com/press-release/zekelman-industries/zekelman-industries-to-acquire-western-tube-conduit-corporation, (accessed July 19, 2017); Zekelman Industries, "Zekelman Industries acquires American Tube Manufacturing, Inc.," February 22, 2017, http://www.zekelman.com/press-release/zekelman-industries/zekelman-industries-acquires-american-tube-manufacturing-inc, (accessed July 19, 2017).

## THE ORIGINAL INVESTIGATION AND SUBSEQUENT REVIEWS

### The original investigations

These reviews of the countervailing duty order for CWP from Turkey, and the antidumping duty orders for circular welded pipe from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey follow from a series of countervailing and antidumping duty petitions filed with Commerce and the Commission since 1983. The following tabulation presents information on the dates of the original orders issued by Commerce, the products and countries covered, the investigation numbers at both Commerce and the Commission, and the Federal Register citations relevant to the issuance of the subject orders.

| Order date | Subject merchandise | Country | Investigation number | | *Federal Register* notice |
|---|---|---|---|---|---|
| | | | Commerce | Commission | |
| 5/7/84 | Small diameter carbon steel pipe tube | Taiwan | A-583-008 | 731-TA-132 | 49 FR 19369 |
| 3/7/86 | Welded carbon steel pipe and tube | Turkey | C-489-502 | 701-TA-253 | 51 FR 7984 |
| 3/11/86 | Welded carbon steel pipe and tube | Thailand | A-549-502 | 731-TA-252 | 51 FR 8341 |
| 5/12/86 | Welded carbon steel pipe and tube | India | A-533-502 | 731-TA-271 | 51 FR 17384 |
| 5/15/86 | Welded carbon steel pipe and tube | Turkey | A-489-501 | 731-TA-273 | 51 FR 17784 |
| | Circular welded nonalloy steel pipe | Brazil | A-351-809 | 731-TA-532 | 57 FR 49453 |
| | Circular welded nonalloy steel pipe | Korea | A-580-809 | 731-TA-533 | 57 FR 49453 |
| | Circular welded nonalloy steel pipe | Mexico | A-201-805 | 731-TA-534 | 57 FR 49453 |
| 11/2/92 | Circular welded nonalloy steel pipe | Taiwan | A-583-814 | 731-TA-536 | 57 FR 49454 |
| Source: Cited *Federal Register* notices. | | | | | |

On April 17, 1984, the Commission determined that an industry in the United States was materially injured by reason of imports of certain small-diameter circular welded carbon steel pipes and tubes from Taiwan that were being sold in the United States at less than fair value

("LTFV").[7] Commerce issued an antidumping duty order on imports of certain small-diameter circular welded carbon steel pipes and tubes from Taiwan on May 7, 1984.

On February 12, 1986, the Commission determined that an industry in the United States was materially injured or threatened with material injury by reason of subsidized imports from Turkey and LTFV imports from Thailand of certain welded carbon steel pipes and tubes.[8] Commerce issued antidumping and countervailing duty orders on these products from Thailand and from Turkey on March 7 and March 11, 1986, respectively.

On April 21, 1986, the Commission determined that an industry in the United States was materially injured by reason of LTFV imports of certain welded carbon steel pipes and tubes from India and Turkey.[9] Commerce issued antidumping duty orders on these products on May 12 and May 15, 1986, respectively.

On October 20, 1992, the Commission determined that an industry in the United States was materially injured by reason of LTFV imports of standard and structural pipes and tubes from Brazil, Korea, Mexico, Taiwan, and Venezuela.[10] On November 2, 1992, Commerce issued antidumping duty orders on these products.

**Subsequent five-year reviews**

In June 2000, the Commission completed full five-year reviews of the subject orders and determined that revocation of the countervailing duty order on circular welded pipe from Turkey and the antidumping duty orders on circular welded pipe from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey would be likely to lead to the continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[11] On

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[7] *Certain Welded Carbon Steel Pipes and Tubes from the Republic of Korea and Taiwan, Invs. Nos. 731-TA-131,132, and 138 (Final)*, USITC Publication 1519 (April 1984). The Commission also determined that an industry in the United States was not materially injured or threatened with material injury by reasons of imports from Korea of heavy-walled rectangular (including square) welded pipes and tubes.

[8] *Certain Welded Carbon Steel Pipes and Tubes from Turkey and Thailand, Invs. Nos. 701-TA-253 and 731-TA-252 (Final)*, USITC Publication 1810 (February 1986). Of the four affirmative voting Commissioners, two found material injury by reason of subject imports and two found threat of material injury by reason of subject imports.

[9] *Certain Welded Carbon Steel Pipes and Tubes from India, Taiwan, and Turkey, Invs. Nos. 731-TA-271 to 273 (Final)*, USITC Publication 1839 (April 1986). The Commission also determined that an industry in the United States was not materially injured or threatened with material injury by reasons of imports of line pipes and tubes from Taiwan and Turkey.

[10] *Certain Circular, Welded, Non-Alloy Steel Pipes and Tubes from Brazil, the Republic of Korea, Mexico, Romania, Taiwan, and Venezuela, Invs. Nos. 731-TA-532-537 (Final),* USITC Publication 2564, October 1992. The Commission also determined that an industry in the United States was not materially injured or threatened with material injury by reasons of imports from Romania of subject pipe and tube, and by reason of imports from Brazil, Korea, Mexico, Taiwan, and Venezuela of finished conduit or mechanical tubing.

[11] *Certain Pipe and Tube from Argentina, Brazil, Canada, India, Korea, Mexico, Singapore, Taiwan, Thailand, Turkey, and Venezuela, Invs. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 276-277, 296, 409-410, 532-534, and 536-537 (Review)*, USITC Publication 3316 (July 2000) ("First Reviews"). The Commission also determined that revocation of the antidumping duty orders on circular welded carbon steel pipe from Venezuela, on light-walled rectangular pipe and tube from Singapore, imports of oil country tubular goods (other than drill pipe) from Canada

(*continued*...)

August 22, 2000, Commerce published notice of the continuation of the countervailing duty order on circular welded pipe from Turkey and the antidumping duty orders on circular welded pipe from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey.[12]

In June 2006, the Commission completed full five-year reviews of the subject orders and determined that revocation of the countervailing duty order on CWP from Turkey and the antidumping duty orders on CWP from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[13] Consequently, Commerce issued a continuation of the countervailing duty order on imports of CWP from Turkey, and the antidumping duty orders on imports of CWP from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, effective August 8, 2006.[14]

On October 4, 2011, the Commission determined that it would conduct full reviews of the countervailing duty order on CWP from Turkey and the antidumping duty orders on CWP from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey. On October 19, 2011, Commerce published its determination that revocation of the countervailing duty order on CWP from Turkey would be likely to lead to material injury within a reasonably foreseeable time and on October 28, 2011, Commerce published its determination that revocation of the antidumping duty orders on CWP from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey would be likely to lead to continuation or recurrence of dumping.[15] On July 5, 2012, the Commission notified Commerce of its determination that material injury would be likely to continue or recur within a reasonably foreseeable time.[16] Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective, July 17, 2012, Commerce issued a continuation of the countervailing duty order on imports of CWP from Turkey and the

(…*continued*)
and Taiwan, and imports of drill pipe from Canada and Taiwan would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

[12] *Continuation of Antidumping Duty Orders: Light-Walled Rectangular Welded Carbon Steel Pipe and Tube From Argentina and Taiwan; Circular Welded Non-Alloy Steel Pipe and Tube from Brazil, Korea, Mexico, and Taiwan; Welded Carbon Steel Pipe and Tube From India, Thailand, and Turkey; and Small Diameter Standard and Rectangular Steel Pipe and Tube From Taiwan*, 65 FR 50955, August 22, 2000.

[13] *Certain Circular Welded Pipe and Tube From Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey* 71 FR 42118, July 25, 2006.

[14] *Continuation of Antidumping Duty Orders on Circular Welded Non–Alloy Pipes and Tubes from Brazil, Mexico, Republic of Korea, Antidumping Duty Orders on Welded Carbon Steel Pipe from India, Thailand and Turkey, and Countervailing Duty Order on Welded Carbon Steel Standard Pipe from Turkey*, 71 FR 44996, August 8, 2006.

[15] *Welded Carbon Steel Pipe and Tube From Turkey: Final Results of Expedited Sunset Review of Countervailing Duty Order,* 76 FR 64900, October 19, 2011 *Certain Circular Welded Carbon Steel Pipes and Tubes From India, Thailand, and Turkey; Final Results of Expedited Five-Year ("Sunset") Reviews of Antidumping Duty Orders*, 76 FR 66893, October 28, 2011, and *Circular Welded Carbon Steel Pipes and Tubes From Brazil, Mexico, the Republic of Korea, and Taiwan: Final Results of the Expedited Third Sunset Reviews of the Antidumping Duty Order*, 76 F.R. 66899, October 28, 2011.

[16] *Certain Circular Welded Pipe and Tube From Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey* 77 FR 39736, July 5, 2012.

antidumping duty orders on imports of CWP from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey.[17]

## PRIOR RELATED INVESTIGATIONS

### Related title VII investigations

The Commission has conducted a number of previous import relief investigations on circular welded pipe or substantially similar merchandise. Table I-2 presents data on previous and related title VII investigations.

**Table I-2**
**CWP: Previous and related Commission proceedings**

| Product | Inv. No. | Year | Country | Original determination | Current status of order |
|---|---|---|---|---|---|
| Circular welded pipe | 701-TA-165 | 1982 | Brazil | Terminated | N/A |
| | 701-TA-166 | 1982 | France | Terminated | N/A |
| | 701-TA-167 | 1982 | Italy | Negative (P) | N/A |
| | 701-TA-168 | 1982 | Korea | Affirmative | Order revoked by Commerce-1985 |
| | 701-TA-169 | 1982 | West Germany | Terminated | N/A |
| | 731-TA-132 | 1983 | Taiwan | Affirmative | Order under review |
| | 701-TA-220 | 1984 | Spain | Terminated | N/A |
| | 731-TA-183 | 1984 | Brazil | Terminated | N/A |
| | 731-TA-197 | 1984 | Brazil | Terminated | N/A |
| | 731-TA-198 | 1984 | Spain | Terminated | N/A |
| | 701-TA-242 | 1985 | Venezuela | Terminated | N/A |
| | 701-TA-251 | 1985 | India | Terminated | N/A |

Table continued on next page.

[17] *Certain Circular Welded Carbon Steel Pipes and Tubes From India, Thailand, and Turkey; Certain Circular Welded Non-Alloy Steel Pipe From Brazil, Mexico, the Republic of Korea, and Taiwan; and Certain Circular Welded Carbon Steel Pipes and Tubes From Taiwan: Continuation of Antidumping and Countervailing Duty Orders,* 77 FR 41967, July 17, 2012.

**Table I-2--Continued**
**CWP: Previous and related Commission proceedings**

| Product | Inv. No. | Year | Country | Original determination | Current status of order |
|---|---|---|---|---|---|
| Circular welded pipe | 701-TA-252 | 1985 | Taiwan | Terminated | N/A |
| | 701-TA-253 | 1985 | Turkey | Affirmative | Order under review |
| | 731-TA-211 | 1985 | Taiwan | Negative | N/A |
| | 731-TA-212 | 1985 | Venezuela | Terminated | N/A |
| | 731-TA-252 | 1985 | Thailand | Affirmative | Order under review |
| | 731-TA-253 | 1985 | Venezuela | Terminated | N/A |
| | 731-TA-271 | 1985 | India | Affirmative | Order under review |
| | 731-TA-273 | 1985 | Turkey | Affirmative | Order under review |
| | 731-TA-274 | 1985 | Yugoslavia | Terminated | N/A |
| | 731-TA-292 | 1986 | China | Negative | N/A |
| | 731-TA-293 | 1986 | Philippines | Negative | N/A |
| | 731-TA-294 | 1986 | Singapore | Negative | N/A |
| | 701-TA-311 | 1991 | Brazil | Terminated | N/A |
| | 731-TA-532 | 1991 | Brazil | Affirmative | Order under review |
| | 731-TA-533 | 1991 | Korea | Affirmative | Order under review |
| | 731-TA-534 | 1991 | Mexico | Affirmative | Order under review |
| | 731-TA-535 | 1991 | Romania | Negative | N/A |
| | 731-TA-536 | 1991 | Taiwan | Affirmative | Order under review |
| | 731-TA-537 | 1991 | Venezuela | Affirmative | Revoked, 2000 review |
| | 731-TA-732 | 1995 | Romania | Negative | N/A |
| | 731-TA-733 | 1995 | South Africa | Negative | N/A |
| | 731-TA-943 | 2001 | China | Negative | N/A |
| | 731-TA-944 | 2001 | Indonesia | Negative (P) | N/A |
| | 731-TA-945 | 2001 | Malaysia | Negative (P) | N/A |

Table continued on next page.

**Table I-2--Continued**
**CWP: Previous and related Commission proceedings**

| Product | Inv. No. | Year | Country | Original determination | Current status of order |
|---|---|---|---|---|---|
| Circular welded pipe | 731-TA-946 | 2001 | Romania | Negative (P) | N/A |
| | 731-TA-947 | 2001 | South Africa | Negative (P) | N/A |
| | 701-TA-447 | 2007 | China | Affirmative | Order in place |
| | 731-TA-1116 | 2007 | China | Affirmative | Order in place |
| | 701-TA-482 | 2012 | India | Negative | N/A |
| | 701-TA-483 | 2012 | Oman | Negative | N/A |
| | 701-TA-484 | 2012 | United Arab Emirates | Negative | N/A |
| | 701-TA-485 | 2012 | Vietnam | Terminated | N/A |
| | 731-TA-1191 | 2012 | India | Negative | N/A |
| | 731-TA-1192 | 2012 | Oman | Negative | N/A |
| | 731-TA-1193 | 2012 | United Arab Emirates | Negative | N/A |
| | 731-TA-1194 | 2012 | Vietnam | Negative | N/A |
| | 701-TA-549 | 2016 | Pakistan | Affirmative | Order in place |
| | 731-TA-1299 | 2016 | Oman | Affirmative | Order in place |
| | 731-TA-1300 | 2016 | Pakistan | Affirmative | Order in place |
| | 731-TA-1301 | 2016 | Philippines | Negative (P) | N/A |
| | 731-TA-1302 | 2016 | United Arab Emirates | Affirmative | Order in place |
| | 731-TA-1303 | 2016 | Vietnam | Affirmative | Order in place |

Source: U.S. International Trade Commission publications.

## Related safeguard investigations

During the 1980s, the United States took steps to limit imports of various steel products into the U.S. market. In October 1982, the United States concluded an agreement with what was then known as the European Coal and Steel Community regulating trade in certain still

products.[18] In response to a January 24, 1984 petition filed by Bethlehem Steel Corp. and the United Steelworkers of America, the Commission conducted an investigation under section 201 of the Trade Act of 1974 regarding imports of a wide range of carbon and certain alloy steel products, including carbon and alloy steel ingots, blooms, billets, slabs, and sheet bars; plates; sheets and strip; wire rods; wire and wire products; railway-type products; bars; structural shapes and units; and pipes and tubes and blanks.[19] The Commission made affirmative determinations with respect to 5 of the 9 investigated products, and the Commission majority recommended various relief measures.[20] On September 18, 1984, the President announced that he would not implement the remedies proposed by the Commission as they were not "in the national economic interest," but instead, as part of a 9-point plan to assist the domestic steel industry to compete with imports, he recommended the negotiation of voluntary restraint agreements ("VRAs") with trading partners to address unfair surges in imports of steel products.[21] Between October 1, 1984, and March 31, 1992, the United States limited imports into the U.S. market of non-alloy carbon steel products from the European Union and 19 other sources through VRAs.[22] The VRAs covered circular welded pipe (as well as other pipe and tube products) from, among other countries, Brazil, Korea, and Mexico.[23] Although there was no VRA with Taiwan, Taiwan established a voluntary unilateral restraint on its steel exports to the United States through an exchange of letters between the Coordination Council for North American Affairs and the American Institute in Taiwan.[24]

In 2001, the Commission determined that certain carbon and alloy steel welded tubular products other than oil country tubular goods (including circular welded pipe as defined in the current proceeding) were being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or threat thereof, to the domestic industry producing such articles, and recommended a tariff-rate quota decreasing from 20 percent to 11 percent over four years.[25] On March 5, 2002, President George W. Bush announced the implementation of steel safeguard measures. Import relief relating to welded tubular products (other than oil country tubular goods) consisted of an additional tariff for a period of three years and one day (15 percent *ad valorem* on imports in the first year, 12 percent in the second year, and 9 percent in the third year).[26] Following receipt of the Commission's mid-term monitoring report in September 2003, and after seeking information from the U.S. Secretary of Commerce and

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[18] 47 Fed. Reg. 49058, October 29, 1982.

[19] *Carbon and Certain Alloy Steel Products, Inv. TA-201-51*, USITC Pub. 1553, July 1984.

[20] *Carbon and Certain Alloy Steel Products, Inv. TA-201-51*, USITC Pub. 1553, July 1984.

[21] 49 Fed. Reg. 36813, September 20, 1984 (President's Memorandum).

[22] *Certain Circular, Welded, Non-Alloy Steel Pipes and Tubes from Brazil, the Republic of Korea, Mexico, Romania, Taiwan, and Venezuela, Invs. Nos. 731-TA-532-537 (Final),* USITC Publication 2564, October 1992, p. I-48.

[23] Ibid.

[24] Ibid.

[25] *Steel; Import Investigations*, 66 FR 67304, December 28, 2001.

[26] *Presidential Proclamation 7529 of March 5, 2002, To Facilitate Positive Adjustment to Competition From Imports of Certain Steel Products*, 67 FR 10553, March 7, 2002. The President also instructed the Secretaries of Commerce and the Treasury to establish a system of import licensing to facilitate steel import monitoring.

U.S. Secretary of Labor, President Bush determined that the effectiveness of the action taken had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.[27] On March 21, 2005, the Commission instituted an investigation under section 204(d) of the Trade Act of 1974 for the purpose of evaluating the effectiveness of the relief action imposed by President Bush on imports of certain steel products. The Commission's report on the evaluation was transmitted to the President and the Congress on September 19, 2005.

In 2005, the Commission conducted a China-specific safeguard investigation on circular welded nonalloy steel pipe (Inv. No. TA-421-6). Following the Commission's affirmative determination of market disruption and remedy recommendations, President Bush issued a proclamation on December 30, 2005, determining not to impose temporary import relief.[28]

## PENDING LITIGATION

On May 11, 2017, the GOT requested that the Dispute Settlement Body of the World Trade Organization ("WTO") establish a panel to consider its complaint that countervailing duty measures by the United States on various tubular products (including CWP) are inconsistent with several provisions of the WTO Agreement on Subsidies and Countervailing Measures ("SCM Agreement"). With respect to the CWP countervailing duty order, the GOT alleges that the Commission's practice of "cross-cumulating" subsidized and non-subsidized imports, with respect to which five-year reviews are initiated on the same day, is inconsistent with the SCM Agreement, both "as such" and "as applied."

## THE PRODUCT

### Commerce's scope

Table I-3 presents the imported product subject to the antidumping and countervailing duty orders under review, as defined by Commerce.

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

[28] *Presidential Proclamation 2006-7 of December 30, 2005, Presidential Determination on Imports of Circular Welded Non-Alloy Steel Pipe from the People's Republic of China*, 71 FR 871, January 6, 2006.

**Table I-3**
**CWP: Commerce's scope definitions**

| | | |
|---|---|---|
| Brazil, Mexico, and Korea | AD<br>731-TA-532, 533, and 534 | …circular welded non-alloy steel pipes and tubes, of circular cross-section, not more than 406.4 millimeters (16 inches) in outside diameter, regardless of wall thickness, surface finish (black, galvanized, or painted), or end finish (plain end, beveled end, threaded and coupled). These pipes and tubes are generally known as standard pipes and tubes and are intended for the low pressure conveyance of water, steam, natural gas, and other liquids and gasses in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses, and generally meets American Society for Testing Materials ("ASTM") A–53 specifications. Standard pipe may also be used for light load-bearing applications, such as for fence tubing, and as structural pipe tubing used for farming and support members for reconstruction or load bearing purposes in the construction, shipbuilding, trucking, farm equipment, and related industries. Unfinished conduit pipe is also included in the orders. All carbon steel pipes and tubes within the physical description outlined above are included within the scope of the orders, except line pipe, oil country tubular goods, boiler tubing, mechanical tubing, pipe and tube hollows for redraws, finished scaffolding, and finished conduit. Standard pipe that is dual or triple certified/stenciled that enters the U.S. as line pipe of a kind used for oil or gas pipelines is also not included in the orders. Imports of the products covered by the orders are currently classifiable under the following Harmonized Tariff Schedule of the United States ("HTS") subheadings: 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090. |
| India | AD<br>731-TA-271 | …certain welded carbon steel standard pipes and tubes with an outside diameter of 0.375 inch or more but not over 16 inches. These products are commonly referred to in the industry as standard pipes and tubes produced to various specifications, most notably ASTM A-53, A-120, or A-135. This merchandise is currently classifiable under HTS item numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090. |

Table continued on next page.

**Table I-3 --Continued**
**CWP: Commerce's scope definitions**

| | | |
|---|---|---|
| Taiwan (1 of 2) | AD<br>731-TA-132 | …certain circular welded carbon steel pipes and tubes from Taiwan, which are defined as: welded carbon steel pipes and tubes, of circular cross section, with walls not thinner than 0.065 inch, and 0.375 inch or more but not over 4.5 inches in outside diameter, currently classified under HTS item numbers 7306.30.5025, 7306.30.5032, 7306.30.5040, and 7306.30.5055. |
| Taiwan (2 of 2) | AD<br>731-TA-536 | ...(1) circular welded non-alloy steel pipes and tubes, of circular cross section over 114.3 millimeters (4.5 inches), but not over 406.4 millimeters (16 inches) in outside diameter, with a wall thickness of 1.65 millimeters (0.065 inches) or more, regardless of surface finish (black, galvanized, or painted), or end-finish (plain end, beveled end, threaded, or threaded and coupled); and (2) circular welded non-alloy steel pipes and tubes, of circular cross-section less than 406.4 millimeters (16 inches), with a wall thickness of less than 1.65 millimeters (0.065 inches), regardless of surface finish (black, galvanized, or painted) or end-finish (plain end, beveled end, threaded, or threaded and coupled). These pipes and tubes are generally known as standard pipes and tubes and are intended for the low pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkling systems, and other related uses, and generally meet ASTM A-53 specifications. Standard pipe may also be used for light loadbearing applications, such as for fence-tubing and as structural pipe tubing used for framing and support members for construction, or load-bearing purposes in the construction, shipbuilding, trucking, farm-equipment, and related industries. Unfinished conduit pipe is also included in the order. All carbon steel pipes and tubes within the physical description outlined above are included within the scope of the order, except line pipe, oil country tubular goods, boiler tubing, mechanical tubing, pipe and tube hollows for redraws, finished scaffolding, and finished conduit. Standard pipe that is dual or triple certified/stenciled that enters the U.S. as line pipe of a kind or used for oil and gas pipelines is also not included in the scope of the order. Imports of the products covered by the order are currently classifiable under the following HTS subheadings, 7306.30.1000, 7306.30.5085, and 7306.30.5090. |
| Thailand | AD<br>731-TA-252 | ...certain welded carbon steel standard pipes and tubes with an outside diameter of 0.375 inch or more but not over 16 inches. These products are commonly referred to in the industry as standard pipes and tubes produced to various ASTM specifications, most notably A-53, A-120, or A-135. This merchandise is currently classifiable under HTS item numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090. |

Table continued on next page.

**Table I-3 --Continued**
**CWP: Commerce's scope definitions**

| | | |
|---|---|---|
| Turkey | CVD<br>701-TA-253 | ...certain welded carbon steel pipe and tube with an outside diameter of 0.375 inch or more, but not over 16 inches, of any wall thickness (pipe and tube) from Turkey. These products are currently provided for under the HTS as item numbers 7306.30.10, 7306.30.50, and 7306.90.10.[1] |
| Turkey | AD<br>731-TA-273 | ...circular welded non-alloy steel pipes and tubes, of circular cross-section, not more than 406.4 millimeters (16 inches) in outside diameter, regardless of wall thickness, surface finish (black, or galvanized, painted), or end finish (plain end, beveled end, threaded and coupled). Those pipes and tubes are generally known as standard pipe, though they may also be called structural or mechanical tubing in certain applications. Standard pipes and tubes are intended for the low-pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioner units, automatic sprinkler systems, and other related uses. Standard pipe may also be used for light load-bearing and mechanical applications, such as for fence tubing, and for protection of electrical wiring, such as conduit shells. The scope is not limited to standard pipe and fence tubing, or those types of mechanical and structural pipe that are used in standard pipe applications. All carbon steel pipes and tubes within the physical description outlined above are included in the scope of this order, except for line pipe, oil country tubular goods, boiler tubing, cold-drawn or cold rolled mechanical tubing, pipe and tube hollows for redraws, finished scaffolding, and finished rigid conduit. Imports of these products are currently classifiable under the following HTS subheadings: 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, and 7306.30.5090. |

[1] During the third review of this investigation, the Commission did not believe any material within the scope was classifiable in HTS 7306.90.10

Source: Commerce continuation orders (77 FR 41967).

## Description and applications[29]

Steel pipes and tubes are generally produced in various grades of carbon, alloy, or stainless steel. Tubular products frequently are distinguished by the following six end uses as defined by the American Iron and Steel Institute ("AISI").

- *Standard pipe* is ordinarily used for low-pressure conveyance of air, steam, gas, water, oil, or other fluids for mechanical applications. It is used primarily in machinery, buildings, sprinkler systems, irrigation systems, and water wells rather than in pipe lines

[29] Unless otherwise noted, this information is based on *Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534 and 536*, USITC Publication INV-KK-060, May 2012, pp. I-29 through I-32.

or utility distribution systems. It may carry fluids at elevated temperatures which are not subject to external heat applications. It is usually produced in standard diameters and wall thicknesses to ASTM specifications.

- *Line pipe* is used for transportation of gas, oil, or water generally in a pipeline or utility distribution system. It is produced to API-5L and American Water Works Association ("AWWA") specifications.

- *Structural pipe and tubing* is generally used for structural or loadbearing purposes above ground by the construction industry, as well as for structural purposes in ships, trailers, farm equipment, and other similar uses. It is produced in nominal wall thicknesses and sizes to ASTM specifications in round, square, rectangular, or other cross-sectional shapes.

- *Mechanical tubing* is produced in a large number of shapes of varied chemical composition. It is not normally produced to meet any specification other than that required to meet the end use. It is produced to meet exact O.D. (outer diameter) and decimal wall thicknesses.

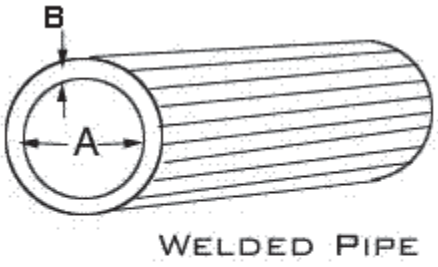
- *Pressure tubing* is used to convey fluids at elevated temperatures or pressures, or both, and is suitable to be subjected to heat applications. It is produced to exact O.D. and decimal wall thicknesses in sizes 0.5 inch to 6 inches O.D. inclusive, usually to specifications such as ASTM.

- *Oil country tubular goods* ("OCTG") are pipe produced to API specifications and used in wells in the oil and gas industries:
    - *Casing* is the structural retainer for the walls of oil or gas wells and covers sizes 4.500 to 20 inches O.D. inclusive.
    - *Tubing* is used within casing oil wells to convey oil to ground level and ordinarily includes sizes 1.050 to 4.500 inches O.D. inclusive.
    - *Drill pipe* is used to transmit power to a rotary drilling tool below ground level and covers sizes to 2.375 to 6.750 inches O.D., inclusive.

Standard pipe of non-alloy steel is the primary product within the scope of these reviews (*see* figure I-1). Standard pipe is intended for the low-pressure conveyance of water, steam, natural gas, air, and other liquids and gases in plumbing and heating systems, air conditioning units, automatic sprinkler systems, and other related uses. Standard pipe may carry liquids at elevated temperatures but may not be subject to the application of external heat. It is made primarily to ASTM A53, A135, and A795 specifications, but can also be made to other specifications, such as British Standard ("BS") 1387. Since these standards often specify required engineering characteristics that overlap, a pipe also can be dual stenciled, meaning that the pipe is stamped with monograms signifying compliance with two different

specifications, such as ASTM A53 and API 5L; however, such dual-stenciled pipe is not within the scope of the subject orders.

**Figure I-1**
**Circular welded pipe: Cross section of welded pipe showing inside diameter "A" and wall thickness "B"**




Source: ASA Alloys, Inc., retrieved at http://www.asaalloys.com/diagrams.html.

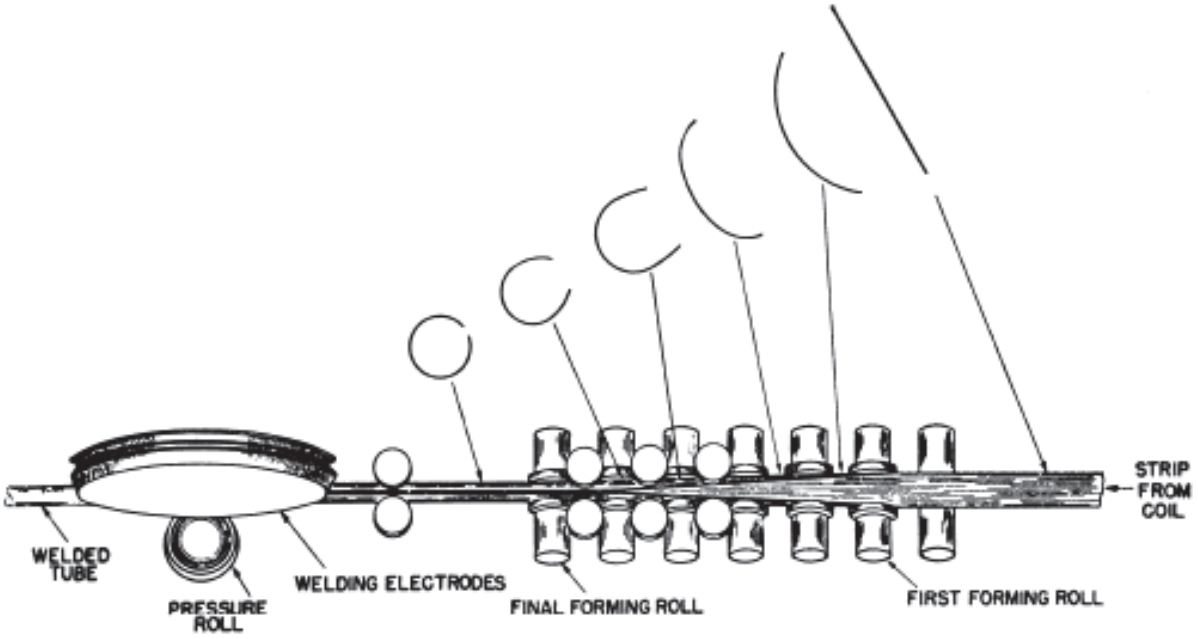
Other uses of circular welded pipe include light load-bearing mechanical applications, such as for fence tubing; scaffolding components; and protection of electrical wiring, such as conduit shells. Fence tubing can be produced to ASTM specification F-1083, which covers hot-dipped galvanized welded steel pipe used for fence structures. However, fence tubing can also be produced without reference to an ASTM specification, or to a general specification such as ASTM A513.

In addition, circular welded pipe is used for structural applications in general construction. Structural pipe is generally used for structural or load-bearing purposes above ground by the construction industry, as well as for structural purposes in ships, trailers, farm equipment, and other similar uses. It is produced in nominal wall thicknesses and sizes. These products also are manufactured primarily to standard ASTM specifications (such as A500 or A252), as well as American Society of Mechanical Engineers ("ASME") specifications. Standard pipe used in light load-bearing, mechanical, and structural applications may be galvanized (zinc-coated by dipping in molten zinc), lacquered (black finish), or painted (black) to provide corrosion resistance, which is important for storage in humid conditions or for ocean transport. End finishes include plain end, which may be either cut, or beveled suitable for welding, or include threaded ends, or threaded or coupled, as well as other special end finishes. Pipe with threaded ends is usually provided "threaded and coupled," meaning that a coupling is attached to one end of each length of pipe.

## Manufacturing process[30]

Circular welded pipes of the sizes subject to these reviews are manufactured by either the electric resistance-welding ("ERW") process or the continuous-welding ("CW") process. The ERW process is a cold-forming process. The raw material input is steel sheet which has been slit into strips of appropriate width that will be consistent with the diameter of the pipe to be welded. The strips, or "skelp," are formed into a tubular shape by passing them through a series of rollers, which provide the initial shaping into round form, as well as guidance into the welding section (figure I-2).

**Figure I-2**
**Circular welded pipe: Operations to make ERW tubes from steel strip**




Source: AISI, *Steel Products Manual – Steel Specialty Tubular Products*, p. 20.

After the strips have been formed to a tubular shape, the edges are heated by electrical resistance and welded by a combination of heat and pressure. The welding pressure causes some of the metal to be squeezed from the joint, forming a bead of metal on both the inside and outside of the tube. While still in the continuous processing line, the tube is then subjected to post-weld heat treatment, as required. This may involve heat treatment of the welded seam only, or treatment of the entire pipe. After heat treatment, sizing rolls shape the tube to the

[30] Unless otherwise noted, this information is based on *Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534 and 536 (Third Review)*, USITC Publication INV-KK-060 (Staff Report), May 2012, pp. I-32 through I-34.

correct diameter. The product is cooled and then cut at the end of the tube mill by a flying shear or saw, synchronized with the tube's movement so that it is not necessary to stop the process. The ERW process can be used to cover the full range of standard pipe diameters pertinent to these investigations.

In the CW process, the entire strip of steel sheet is heated to approximately 2,450 degrees Fahrenheit in a gas-fired, continuous furnace. As the strip leaves the furnace, a blower is normally furnished to provide a blast of air to raise the temperature of the edges to approximately 2,600 degrees Fahrenheit for welding. The strip is formed into tubular shape by a series of rollers, and the edges are butted together under pressure to form the weld. While still hot, the product may be processed through a stretch reduction mill, which simultaneously reduces the diameter and wall thickness of the pipe. The continuous tube is then cut into predetermined lengths by a flying saw or shear. The CW method can be used to produce pipe up to 4.5 inches in O.D.

Finishing operations on standard pipe and tube may include hydrostatic testing, oiling, and galvanizing. The process of galvanizing involves the application of a zinc coating to steel pipe for protection from atmospheric corrosion. In a hot-dip process of galvanizing, cut lengths of steel pipe are dipped in a bath of molten zinc maintained at a temperature of 820 to 860 degrees Fahrenheit. The combination of the temperature of both the zinc and the steel, as well as the immersion time within the zinc bath, determine the thickness of the coating. The zinc coating may be applied to the outside only, or both the inside and outside of the steel pipe, depending on end-use application and industry specification (*e.g.*, ASTM). In a continuous galvanizing process, the zinc coating may be applied to the outside of the pipe before the steel pipe is cut to length by passing it through a bath of molten zinc.

End finishing may include square cutting, beveling, threading, or grooving. Threaded pipe may be furnished "threaded and coupled," in which case both ends of each length of pipe are threaded and a threaded coupling is applied to one end.

### U.S. tariff treatment

As previously discussed, circular welded pipe is classifiable and imported under the following subheadings of the Harmonized Tariff Schedule of the United States ("HTS"): 7306.30.10 and 7306.30.50. The current general rate of duty for circular pipe and tube is free.

### The definition of the domestic like product

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. In its original determinations and its first full five-year review

determinations, the Commission defined the domestic like product as all circular welded non-alloy steel pipe and tube not more than 16 inches in outside diameter.[31]

In the second reviews, domestic interested parties urged the Commission to define the domestic like product as it had in the first reviews, no party argued otherwise, and the record did not indicate any changes in the relevant facts. Consequently, the Commission again defined the domestic like product as all circular, welded, non-alloy steel pipe and tube not more than 16 inches in outside diameter.[32]

In the third full five-year reviews, domestic interested parties asked for the same definition as in prior reviews and no party argued for a different definition and the Commission once again defined a single domestic like product consisting of circular, welded, non-alloy steel pipe and tube not more than 16 inches in outside diameter. [33]

In its notice of institution for these reviews, the Commission solicited comments from interested parties regarding what they deemed to be the appropriate definition of the domestic like product. In to their response to the notice of institution, the domestic interested parties agreed with the Commission's definition of the domestic like product as stated in the last five-year reviews. However, domestic interested parties believe the Commission should consider CWP and light walled rectangular pipe and tube in separate reviews.[34] The respondent interested party did not comment on the domestic like product. [35]

## ACTIONS AT COMMERCE

Commerce has not conducted any critical circumstances reviews, or anti-circumvention findings since the completion of the last five-year reviews. In addition, Commerce has not made any duty absorption findings or scope rulings since the imposition of the orders.

### Company revocations

In the original investigation of CWP from India, Commerce excluded two producers of CWP, Zenith Steel Pipes and Industries Ltd. ("Zenith") and Gujarat Steel Tubes Ltd.[36]

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[31] *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey,* USITC Publication 4333, June 2012, pp 9-10.

[32] *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey,* USITC Publication 4333, June 2012, p 10.

[33] Ibid.

[34] *Domestic Interested Parties' Response to the Notice of Institution,* July 3, 2017, p. 23.

[35] *Respondent Interested Party Response to the Notice of Institution,* July 3, 2017, p. 12.

[36] *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey,* USITC Publication 4333, June 2012, p I-21.

### Changed circumstances reviews

Since the continuation of the last orders, Commerce initiated a changed circumstances review for CWP from Korea. In its preliminary determination, Commerce determined that Hyundai Steel is the successor-in-interest to Hyundai HYSCO.[37]

### Current five-year reviews

Commerce is conducting expedited reviews with respect to all orders subject to these reviews and intends to issue the final results of these reviews based on the facts available not later than October 2, 2017.[38] [39]

## THE INDUSTRY IN THE UNITED STATES

### U.S. producers

Over time, the composition of the domestic circular welded pipe industry has shifted. Allied has consistently accounted for *** of domestic production. However, most of the other large producers from the initial investigations have changed substantially. LTV, formed from the merger of Republic Steel and Jones & McLaughlin Steel, was the *** producer in 1984-85 ***. LTV subsequently entered into bankruptcy, though several of its former mills produce circular welded pipe as Atlas (which acquired LTV's Copperweld division and portions of Maverick's product line after Maverick acquired LTV's Tubular division). U.S. Steel, the *** producer in 1984-85, spun off its Geneva and Fairless Hills facilities to Geneva Steel and Laclede Steel, both sizeable producers that subsequently ceased production. Wheatland, on the other hand, has grown to be the largest producer in the domestic industry, acquiring, consolidating, and ultimately rationalizing the operations of Sawhill Tubular and Sharon Tube.[40]

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[37] *Circular Welded Non-Alloy Steel Pipe From the Republic of Korea: Initiation and Preliminary Results of Antidumping Duty Changed Circumstances Review,* 81 FR 29842, May 13, 2016.

[38] *Letter from Irene Darzenta Tzafolias, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Michael G. Anderson*, August 9, 2017.

[39] In the initial notice of institution, Commerce omitted one of the investigations regarding Taiwan. Commerce issued a correction initiating the review of circular welded non-alloy steel pipe from Taiwan (fourth review) on June 18. *Initiation of Five-Year (Sunset) Review; Correction,* 82 FR 27690, June 16, 2017.

[40] *See* confidential staff reports from the original investigations and subsequent reviews (plant locations and shares of production). See also *Steel: Evaluation of the Effectiveness of Import Relief, Investigation No. TA-204-12*, USITC Publication 3797, September 2005, Chapters CIRCULAR I and II.

During the first reviews, twenty-five firms supplied the Commission with information on their U.S. operations with respect to circular welded pipe,[41] and twenty firms responded during the second reviews.[42] During the third reviews, the Commission obtained data from 17 producers.[43] In all previous reviews, these firms accounted for the vast majority of U.S. production of circular welded pipe during the periods for which data were collected in those reviews. In response to the Commission's notice of institution in this current review, domestic interested parties provided a list of four additional known and currently operating U.S. producers of CWP.[44] [45]

**Definition of the domestic industry and related party issues**

The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a related party for purposes of its injury determination if "appropriate circumstances" exist.[46] In its original determination and its prior five-year review determinations, the Commission defined the domestic industry as all U.S. producers of the domestic like product.[47] In the third reviews, three U.S. producers were related to foreign

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[41] The responding firms were Allied Tube & Conduit, American Steel Pipe, Bull Moose, California Steel, Century Tube, EXLTUBE, IPSCO Tubulars, Laclede Steel, Leavitt Tube, Lone Star Steel, LTV Tubular, Maruichi American, Maverick Tube, Newport Steel, Northwest Pipe, Parthenon Metal Works, Prudential Steel, Sawhill Tubular, Searing Industries, Sharon Tube, Tex-Tube, USX, Western Tube & Conduit, and Wheatland Tube.

[42] The responding firms were Allied, American, Atlas, Bull Moose, California, Hanna, IPSCO, Laclede, Leavitt, Lone Star, LTV Copperweld, Maruchi, Maverick, Newport, Northwest, Sawhill, Sharon, Stupp, Tex-Tube, U.S. Steel, and Vest.

[43] Since 2006, the U.S. circular welded pipe industry has experienced several mergers and acquisitions, including U.S. Steel's acquisition of Lone Star in 2007 and JMC Steel Group's acquisition of Atlas in 2006 and Sharon Tube in 2007.

[44] *Domestic Interested Parties' Response to the Notice of Institution*, July 3, 2017, p.20.

[45] Zekelman Industries includes the operating divisions of Atlas Tube, Picoma, Energez Tube, Sharon Tube, Wester Tube & Conduit Corporation, Wheatland Tube, and Z Modular.

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

[47] *Certain Welded Carbon Steel Pipes and Tubes from the Republic of Korea and Taiwan, Inv. Nos. 731-TA-131, 132, and 138 (Final),* USITC Publication 1519, April 1984, pp. 3-4; *Certain Welded Carbon Steel Pipes and Tubes from Turkey and Thailand, Inv. Nos. 701-TA-253 and 731-TA-252 (Final),* USITC Publication 1810, February 1986, pp. 6-7; *Certain Light-Walled Rectangular Pipes and Tubes from Taiwan, Inv. No. 731-TA-410 (Final),* USITC Publication 2169, March 1989, pp. 3-6; *Certain Circular, Welded, Non-Alloy Steel Pipes and Tubes from Brazil, the Republic of Korea, Mexico, Romania, Taiwan, and Venezuela, Inv. Nos. 731-TA-532-537 (Final),* USITC Publication 2564, October 1992, pp. 5-8; *Certain Circular Welded Pipe and Tube from Argentina, Brazil, Canada, India, Korea, Mexico, Singapore, Taiwan, Thailand, Turkey, and Venezuela, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 276, 277, 409, 410, 532-534, and 536, and 537, (Review)*, USITC Publication 3316, July 2000, pp. 7-16; *Certain Circular*

(*continued*...)

producers of the subject merchandise and one U.S. producer was related to U.S. importers of the subject merchandise. The Commission did not find that appropriate circumstances existed to exclude any firm from the domestic industry pursuant to the related parties provision in any of the previous reviews.[48]

In its notice of institution for these reviews, the Commission solicited comments from interested parties regarding the appropriate definition of the domestic industry and inquired as to whether any related parties issues existed. The domestic interested parties did not cite any potential related parties issues and agreed with the Commission's prior definition of the domestic industry.[49]

### 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 of the current five-year reviews.[50] Table I-4 presents a compilation of the data submitted from all responding U.S. producers as well as trade and financial data submitted by U.S. producers in the prior five-year reviews.[51]

**Table I-4**
**CWP: Trade and financial data submitted by U.S. producers, 2001, 2006, 2011, and 2016**

* * * * * * *

## U.S. IMPORTS AND APPARENT U. S. CONSUMPTION

### U.S. importers

In the first full five-year reviews, 43 U.S. importing firms supplied the Commission with usable information on their operations involving the importation of CWP, and 34 firms provided usable data in the second full five-year reviews, accounting for over 50 percent of subject imports, based on official Commerce statistics, over the period for which data were collected.

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(…*continued*)
*Welded Pipe and Tube from Argentina, Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 409, 410, 532-534, and 536, (Second Review)*, USITC Publication 3867, July 2006, pp. 6-7; *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review)*, USITC Publication 4333, June 2012, pp. 9-10.

[48] *Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review)*, USITC Publication 4333, June 2012, pp. 10-11.

[49] *Domestic Interested Parties' Response to the Notice of Institution,* July 3, 2017, p. 23.

[50] Individual company trade and financial data are presented in app. B.

[51] Final investigation data are not presented due to the aligning of four original investigations with differing final investigation years. These data are available in Appendix C.

In the third full five-year reviews, usable questionnaire responses were received from 21 companies, representing over one-half of total subject imports over the period for which data were collected, based on official Commerce statistics. [52] The domestic interested parties provided a list of 22 potential U.S. importers of CWP.[53]

## U.S. imports

Table I-5 presents the quantity, value, and unit value for imports from subject countries as well as the other top sources of U.S. imports. Subject imports have remained present in the U.S. market throughout the period under review and have remained relatively consistent with the exception of a spike in subject imports from all countries under review except Brazil in 2015. The majority of imports of CWP are from non-subject countries, mainly due to the imports from Canada.

**Table I-5**
**CWP: U.S. imports, 2012-16**

| Item | 2012 | 2013 | 2014 | 2015 | 2016 |
|---|---|---|---|---|---|
| | Quantity (Short Tons) | | | | |
| Brazil (subject) | 1,225 | 1,620 | 201 | 296 | 310 |
| India (subject) | *** | *** | *** | *** | *** |
| Korea (subject) | 56,510 | 56,787 | 43,944 | 61,428 | 87,668 |
| Mexico (subject) | 66,490 | 65,357 | 57,765 | 61,369 | 61,038 |
| Taiwan (subject) | 2,910 | 617 | 2,814 | 13,765 | 14,487 |
| Thailand (subject) | 115,190 | 43,968 | 43,133 | 60,116 | 58,348 |
| Turkey (subject) | 67,266 | 51,670 | 61,772 | 110,562 | 50,293 |
| Total subject imports | *** | *** | *** | *** | *** |
| Canada | 222,133 | 229,658 | 228,769 | 227,590 | 224,144 |
| China | 3,778 | 5,044 | 6,368 | 24,012 | 86,740 |
| India (nonsubject) | *** | *** | *** | *** | *** |
| United Arab Emirates | 40,235 | 44,726 | 76,365 | 108,401 | 52,872 |
| Vietnam | 42,156 | 65,445 | 60,546 | 83,393 | 59,089 |
| All other imports (nonsubject) | 167,636 | 120,247 | 126,177 | 126,826 | 88,869 |
| Total nonsubject imports | *** | *** | *** | *** | *** |
| Total imports | 788,736 | 694,752 | 714,232 | 890,445 | 799,268 |

Table continued on next page.

[52] *Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review): Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey—Staff Report,* INV-KK-060, May 29, 2012, p. I-39

[53] *Domestic Interested Parties' Response to the Notice of Institution,* July, 3, 2017, p. 21.

**Table I-5--Continued**
**CWP: U.S. imports, 2012-16**

| Item | 2012 | 2013 | 2014 | 2015 | 2016 |
|---|---|---|---|---|---|
| | Landed, duty-paid value ($1,000) | | | | |
| Brazil (subject) | 978 | 501 | 392 | 841 | 1,196 |
| India (subject) | *** | *** | *** | *** | *** |
| Korea (subject) | 61,104 | 54,737 | 43,944 | 50,608 | 53,583 |
| Mexico (subject) | 59,874 | 57,770 | 53,053 | 48,698 | 49,114 |
| Taiwan (subject) | 3,754 | 974 | 2,507 | 11,687 | 8,511 |
| Thailand (subject) | 110,495 | 38,552 | 37,189 | 49,398 | 32,953 |
| Turkey (subject) | 62,282 | 43,225 | 52,319 | 81,516 | 31,231 |
| Total subject imports | *** | *** | *** | *** | *** |
| Canada | 254,513 | 267,081 | 273,833 | 250,646 | 240,126 |
| China | 5,805 | 7,020 | 9,825 | 32,467 | 105,714 |
| India (nonsubject) | *** | *** | *** | *** | *** |
| United Arab Emirates | 37,962 | 39,850 | 64,867 | 84,767 | 32,346 |
| Vietnam | 37,565 | 54,033 | 48,261 | 60,894 | 37,445 |
| All other imports (nonsubject) | 190,662 | 132,387 | 129,675 | 125,589 | 84,828 |
| Total nonsubject imports | *** | *** | *** | *** | *** |
| Total imports | 828,320 | 705,196 | 722,300 | 807,843 | 687,593 |
| | Unit value (dollars per short tons) | | | | |
| Brazil (subject) | 797.91 | 309.45 | 1,949.31 | 2,838.91 | 3,854.93 |
| India (subject) | *** | *** | *** | *** | *** |
| Korea (subject) | 1,081.28 | 963.91 | 1,000.00 | 823.85 | 611.20 |
| Mexico (subject) | 900.49 | 883.91 | 918.44 | 793.53 | 804.65 |
| Taiwan (subject) | 1,289.80 | 1,577.10 | 890.97 | 849.05 | 587.49 |
| Thailand (subject) | 959.24 | 876.83 | 862.19 | 821.70 | 564.77 |
| Turkey (subject) | 925.91 | 836.57 | 846.97 | 737.29 | 620.97 |
| Total subject imports | *** | *** | *** | *** | *** |
| Canada | 1,145.77 | 1,162.95 | 1,196.99 | 1,101.31 | 1,071.30 |
| China | 1,536.57 | 1,391.88 | 1,542.92 | 1,352.13 | 1,218.74 |
| India (nonsubject) | *** | *** | *** | *** | *** |
| United Arab Emirates | 943.50 | 890.98 | 849.44 | 781.97 | 611.78 |
| Vietnam | 891.10 | 825.62 | 797.10 | 730.21 | 633.72 |
| All other imports (nonsubject) | 1,137.36 | 1,100.95 | 1,027.72 | 990.25 | 954.53 |
| Total nonsubject imports | *** | *** | *** | *** | *** |
| Total imports | 1,050.19 | 1,015.03 | 1,011.30 | 907.24 | 860.28 |

Note.--Because of rounding, figure may not add to total shown.
Source: Official statistics of Commerce and confidential Customs data for HTS statistical reporting numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090.

## Apparent U.S. consumption and market shares

Table I-6 presents data on U.S. producers' U.S. shipments, U.S. imports, and apparent U.S. consumption, while table I-7 presents data on U.S. market shares of U.S. apparent consumption. Imports from subject countries continued to enter the U.S. market since the imposition of the original orders. Concurrently, U.S. producers' U.S. shipments continued to decline, and in 2016 were over one million short tons lower than during the first full five-year reviews. Subject imports have been declining since the imposition of the orders, however non-subject imports have remained prevalent and growing, accounting for 37.4 percent of apparent U.S. consumption, compared to the U.S. producers' share of 49.4 percent.

**Table I-6**
**CWP: U.S. producers' U.S. shipments, U.S. imports, and apparent U.S. consumption, 2001, 2006, 2011, and 2016**

| Item | 2001 | 2006 | 2011 | 2016 |
|---|---|---|---|---|
| | Quantity (Short Tons) | | | |
| U.S. producers' U.S. shipments | 1,674,000 | 1,230,000 | 966,000 | 671,581 |
| U.S. imports from— | | | | |
| Brazil (subject) | 0 | 1,000 | 401 | 310 |
| India (subject) | *** | *** | *** | *** |
| Korea (subject) | 218,000 | 44,000 | 48,054 | 87,668 |
| Mexico (subject) | 1,000 | 75,000 | 66,017 | 61,038 |
| Taiwan (subject) | 7,000 | 43,000 | 22,966 | 14,487 |
| Thailand (subject) | 62,000 | 78,000 | 47,696 | 58,348 |
| Turkey (subject) | 5,000 | 32,000 | 31,723 | 50,293 |
| Total subject imports | *** | *** | *** | *** |
| All other | *** | *** | *** | *** |
| Total imports | 843,306 | 1,180,000 | 506,620 | 783,303 |
| Apparent U.S. consumption | 2,517,306 | 2,410,000 | 1,472,620 | 1,454,884 |

Table continued on next page.

**Table I-6--Continued**
**CWP: U.S. producers' U.S. shipments, U.S. imports, and apparent U.S. consumption, 2001, 2006, 2011, and 2016**

| Item | 2001 | 2006 | 2011 | 2016 |
|---|---|---|---|---|
| | Value (1,000 dollars) | | | |
| U.S. producers' U.S. shipments | 892,797 | 1,216,918 | 1,043,584 | 561,767 |
| U.S. imports from— | | | | |
| Brazil (subject) | 0 | 841 | 1,041 | 1,196 |
| India (subject) | *** | *** | *** | *** |
| Korea (subject) | 82,564 | 35,399 | 51,190 | 53,583 |
| Mexico (subject) | 783 | 61,461 | 63,670 | 49,114 |
| Taiwan (subject) | 2,468 | 26,302 | 20,989 | 8,511 |
| Thailand (subject) | 26,622 | 52,738 | 46,507 | 32,953 |
| Turkey (subject) | 1,863 | 21,087 | 30,124 | 31,231 |
| Total subject imports | *** | *** | *** | *** |
| All other | *** | *** | *** | *** |
| Total imports | 373,422 | 741,190 | 505,746 | 687,593 |
| Apparent U.S. consumption | 1,266,219 | 1,958,108 | 1,549,330 | 1,249,360 |

Source: For the years 2001, 2006, and 2011, data are compiled using data submitted in the Commission's prior five-year reviews. *See app. C*. For the year 2016, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics and confidential Customs data under HTS numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090.

**Table I-7**
**CWP: Apparent U.S. consumption and U.S. market shares, 2001, 2006, 2011, and 2016**

| Item | 2001 | 2006 | 2011 | 2016 |
|---|---|---|---|---|
| | **Quantity (Short Tons)** | | | |
| Apparent U.S. consumption | 2,517,306 | 2,410,000 | 1,472,620 | 1,454,884 |
| | **Value (*1,000 dollars*)** | | | |
| Apparent U.S. consumption | 1,266,219 | 1,958,108 | 1,549,330 | 1,249,360 |
| | **Share of consumption based on quantity (*percent*)** | | | |
| U.S. producer's share | 66.5 | 51.0 | 65.6 | 46.2 |
| U.S. imports from-- | | | | |
| Brazil (subject) | 0.0 | 0.04 | 0.03 | 0.0 |
| India (subject) | *** | *** | *** | *** |
| Korea (subject) | 8.66 | 1.83 | 3.26 | 6.0 |
| Mexico (subject) | 0.04 | 3.11 | 4.48 | 4.2 |
| Taiwan (subject) | 0.28 | 1.78 | 1.56 | 1.0 |
| Thailand (subject) | 2.46 | 3.24 | 3.24 | 4.0 |
| Turkey (subject) | 0.20 | 1.33 | 2.15 | 3.5 |
| Total subject imports | *** | *** | *** | *** |
| All other | *** | *** | *** | *** |
| Total imports | 33.50 | 48.96 | 34.4 | 53.8 |
| | **Share of consumption based on value (*percent*)** | | | |
| U.S. producer's share | 70.5 | 62.1 | 67.4 | 45.0 |
| U.S. imports from-- | | | | |
| Brazil (subject) | 0.0 | 0.0 | 0.1 | 0.1 |
| India (subject) | *** | *** | *** | *** |
| Korea (subject) | 6.5 | 1.8 | 3.3 | 4.3 |
| Mexico (subject) | 0.1 | 3.1 | 4.1 | 3.9 |
| Taiwan (subject) | 0.2 | 1.3 | 1.4 | 0.7 |
| Thailand (subject) | 2.1 | 2.7 | 3.0 | 2.6 |
| Turkey (subject) | 0.1 | 1.1 | 1.9 | 2.5 |
| Total subject imports | *** | *** | *** | *** |
| All other | *** | *** | *** | *** |
| Total imports | 29.5 | 37.9 | 32.6 | 55.0 |

Source: For the years 2001, 2006, and 2011, data are compiled using data submitted in the Commission's prior five-year reviews. *See app. C*. For the year 2016, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics and confidential Customs data under HTS numbers 7306.30.1000, 7306.30.5025, 7306.30.5032, 7306.30.5040, 7306.30.5055, 7306.30.5085, 7306.30.5090.

## CUMULATION CONSIDERATIONS

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Additional information concerning geographical markets and simultaneous presence in the market is presented below.[54]

Imports of CWP from Brazil entered the United States in 42 out of the 60 months under review. The two highest months of imports from Brazil in terms of quantity were September 2012 and February of 2013 at 593 and 586 short tons respectively. In 2016, imports from Brazil entered the United States in every month except January, peaking at 48 short tons in April, followed by May at 44 short tons and December at 42 short tons. Imports of CWP from India entered the United States in 59 out of the 60 months under review. Quantity of imports from India exceeded *** short tons in 16 of those months, and reached *** in March of 2015 and *** short tons in September of 2016. Imports of CWP from Korea entered the United States in all 60 of the months under review. All 60 months saw import levels above 1,000 short tons, and three months saw imports above 10,000 short tons, with 11,111 short tons entering the United States in May 2013, 10,235 short tons entering the United States in June 2015, and 10,290 short tons entering the United States from Korea in August 2016. Imports of CWP from Mexico entered the United States in all 60 of the months under review. Import levels remained relatively consistent over the period, with the lowest level of imports in August 2015 at 3,064 short tons and the highest level in April 2016 at 7,418 short tons. Imports of CWP from Taiwan entered the United States in 58 out of the 60 months under review, with 13 months seeing imports above 1,000 short tons, concentrating in the second half of both 2015 and 2016. December 2016 saw the highest levels of imports at 3,679 short tons followed by March 2015 at 2,274 short tons. Imports of CWP from Thailand entered the United States in 56 of the 60 months under review. Import levels varied widely, with 11 months seeing imports over 10,000 short tons and 19 months seeing import levels less than 1,000 short tons, including 4 months with no imports of CWP from Thailand. September 2012 saw the largest amount of imports from Thailand at 18,391 short tons, followed closely by May 2015 at 18,147 short tons and June 2012 at 18,024 short tons. Imports of CWP from Turkey entered the United States in 58 of the 60 months under review. Similarly to Thailand, import volumes varied widely, with 19,899 short tons entering the United States from Turkey in January 2015 while 1 short ton entered the United States in November, 2013 and March and June 2013 saw no imports from Turkey.

Subject imports entered the United States across all four borders of entry, however imports from Brazil did not enter through the West coast. The largest entry districts for imports for CWP from Brazil in 2016 were New York, New York and Chicago, Illinois. The largest entry

[54] In addition, available information concerning subject country producers and the global market is presented in the next section of this report.

districts for imports of CWP from India in 2016 were Houston-Galveston, Texas, followed by Savannah, Georgia; and Chicago, Illinois. The largest entry districts for imports of CWP from Korea in 2016 were Los Angeles, California, followed by Houston-Galveston, Texas; Mobile, Alabama; Columbia-Snake, Oregon; Tampa, Florida; and Seattle, Washington, The largest entry districts for imports of CWP from Mexico in 2016 were Laredo, Texas, followed by San Juan, Puerto Rico. The largest entry districts for imports of CWP from Taiwan in 2016 were Los Angeles, California, followed by Houston-Galveston, Texas; Philadelphia, Pennsylvania; and Savannah, Georgia. The largest entry districts for imports of CWP from Thailand in 2016 were Houston-Galveston, Texas, followed by Los Angeles, California; Tampa, Florida; Seattle, Washington; and San Francisco, California. The largest entry districts for imports of CWP from Turkey in 2016 were Houston-Galveston, Texas; followed by Baltimore, Maryland; Philadelphia, Pennsylvania; and Savannah, Georgia.

## THE INDUSTRY IN BRAZIL

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately *** percent of production of CWP from Brazil during 1989-1991, and 17 and 34 percent of exports from Brazil to the United States of CWP. During the first five-year reviews, the Commission tried to send questionnaires to three possible CWP producers in Brazil. Of the two firms to which it was able to transmit the questionnaire, one did not respond and one reported that it did not produce the product. In the second five-year reviews, the Commission transmitted questionnaires to ten possible producers of CWP, but none provided questionnaire responses. In the third five-year review, the Commission sent questionnaires to ten firms in Brazil identified as possible producers of CWP according to parties' responses to the notice of institution, proprietary Customs data, and Commerce notices. None of the firms provided data on CWP operations and one firm provided a response indicating that it did not produce or export CWP to the United States. [55]

Table I-8 presents data on exports of CWP from Brazil to leading foreign markets during 2012-16. The United States was the seventh largest export destination for CWP from Brazil and accounted for 2.6 percent of Brazil's CWP exports in 2016. Paraguay, Argentina, and Uruguay were the three largest export destinations for CWP from Brazil and accounted for 22.9, 21.5, and 19.8 percent of CWP exports in 2016, respectively. Brazil's exports of CWP increased from 2012 to 2013 before declining 42.0 percent during 2013-16.

[55] *Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review): Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey—Staff Report,* INV-KK-060, May 29, 2012 p. IV-18

**Table I-8**
**CWP: Exports of CWP from Brazil, by destination, 2012-16**

| Item | Calendar year | | | | |
|---|---|---|---|---|---|
| | 2012 | 2013 | 2014 | 2015 | 2016 |
| | | | Quantity (short tons) | | |
| Paraguay | 3,030 | 5,039 | 2,561 | 3,337 | 2,871 |
| Argentina | 5,049 | 5,960 | 4,872 | 3,201 | 2,689 |
| Uruguay | 2,564 | 2,272 | 1,875 | 1,972 | 2,480 |
| Bolivia | 868 | 1,884 | 4,144 | 3,585 | 1,682 |
| Mexico | 1,243 | 1,077 | 978 | 825 | 1,048 |
| Angola | 643 | 2,236 | 1,791 | 1,190 | 983 |
| United States | 1,534 | 1,210 | 204 | 329 | 328 |
| Ghana | 0 | 1 | 16 | 0 | 110 |
| Colombia | 535 | 342 | 84 | 98 | 102 |
| Canada | 16 | 20 | 0 | 0 | 82 |
| All other | 2,572 | 1,558 | 638 | 1,274 | 146 |
| Total | 18,054 | 21,599 | 17,163 | 15,810 | 12,521 |
| | | | Value (1,000 dollars) | | |
| Argentina | 11,274 | 11,439 | 10,409 | 5,749 | 4,259 |
| Paraguay | 3,651 | 6,095 | 2,692 | 3,431 | 2,762 |
| Angola | 1,673 | 4,675 | 3,810 | 2,192 | 2,546 |
| Mexico | 3,471 | 2,775 | 2,128 | 1,436 | 1,672 |
| Uruguay | 2,641 | 2,215 | 1,683 | 1,467 | 1,439 |
| Bolivia | 1,032 | 1,942 | 3,911 | 3,006 | 1,185 |
| United States | 2,758 | 1,926 | 361 | 944 | 1,153 |
| Ghana | - | 1 | 46 | 0 | 597 |
| Colombia | 1,627 | 1,064 | 490 | 279 | 409 |
| Canada | 44 | 59 | 0 | - | 201 |
| All other | 8,899 | 5,024 | 2,720 | 1,810 | 549 |
| Total | 37,070 | 37,216 | 28,248 | 20,314 | 16,771 |

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7306.30.These data may be overstated as HTS 7306.30 may contain products outside the scope of this review.

## THE INDUSTRY IN INDIA

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for the majority of production of subject CWP from India during 1985, and approximately *** percent of exports from India to the United States of CWP during 1985. Two firms (Zenith and Gujarat) were excluded from the order by Commerce. In the first five-year reviews, U.S. producers identified at least three producers of CWP (and industry publication and questionnaire data identified an estimated 40 pipe producers) in India of which one (***) provided responses to the Commission's questionnaire. *** reported *** exports of CWP to the United States between January 1997 and September 1999. In the second reviews, there were an estimated 46 steel tube producers in India, of which one (Tata Group, Steel Tubes division) provided questionnaire data. Tata reported *** exports of CWP to the United States during 1999-2005. In the third full five-year reviews, the Commission sent questionnaires to ten firms in India identified as possible producers of CWP according to parties' responses to the notice of institution, proprietary Customs data, and Commerce notices. None of the firms provided data on CWP operations. [56]

Table I-9 presents data on exports of CWP from India to leading foreign markets during 2012-16. The United Arab Emirates, Belgium, and the United Kingdom were the three largest export destinations by quantity for CWP from India and accounted for 19.9 percent, 10.7 percent, and 10.1 percent of CWP exports in 2016, respectively. India's exports of CWP increased 122.3 percent from 2012 to 2014 before declining in 2015 and 2016 by 6.2 percent and 9.3 percent respectively.

[56] *Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review): Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey—Staff Report,* INV-KK-060, May 29, 2012 p. IV-22

**Table I-9**
**CWP: Exports of CWP from India, by destination, 2012-16**

| Item | Calendar year | | | | |
|---|---|---|---|---|---|
| | 2012 | 2013 | 2014 | 2015 | 2016 |
| **Quantity (short tons)** | | | | | |
| United Arab Emirates | 14,803 | 35,838 | 42,063 | 57,334 | 41,600 |
| Belgium | 10,756 | 28,182 | 25,920 | 24,293 | 22,354 |
| United Kingdom | 6,142 | 39,142 | 49,150 | 19,893 | 21,078 |
| Ethiopia | 12,018 | 6,471 | 6,017 | 7,706 | 17,835 |
| Germany | 4,979 | 8,230 | 9,888 | 9,675 | 17,199 |
| Qatar | 6,119 | 10,495 | 11,550 | 14,719 | 16,165 |
| Australia | 3,657 | 11,940 | 23,235 | 21,322 | 10,577 |
| Netherlands | 5,197 | 2,585 | 13,100 | 8,908 | 10,289 |
| Egypt | - | 74 | 2,965 | 15,168 | 7,596 |
| Sri Lanka | 9,579 | 10,139 | 5,786 | 6,405 | 5,183 |
| All other | 37,396 | 72,451 | 56,239 | 45,186 | 39,391 |
| Total | 110,646 | 225,547 | 245,913 | 230,610 | 209,268 |
| **Value (1,000 dollars)** | | | | | |
| United Arab Emirates | 11,740 | 27,594 | 31,933 | 39,529 | 25,074 |
| Belgium | 8,469 | 21,114 | 17,661 | 15,437 | 11,702 |
| United Kingdom | 4,609 | 27,709 | 35,546 | 12,756 | 11,261 |
| Ethiopia | 11,165 | 8,260 | 4,465 | 4,969 | 10,795 |
| Qatar | 4,902 | 7,622 | 8,353 | 9,777 | 9,155 |
| Germany | 3,661 | 6,163 | 7,153 | 6,013 | 8,486 |
| Australia | 2,918 | 8,980 | 18,139 | 14,118 | 6,228 |
| Egypt | - | 74 | 3,152 | 4,947 | 5,673 |
| Netherlands | 4,242 | 2,151 | 5,857 | 5,957 | 5,474 |
| Niger | 50 | - | - | 2,354 | 3,603 |
| All other | 40,354 | 55,224 | 51,667 | 36,585 | 32,616 |
| Total | 92,111 | 164,890 | 183,926 | 152,443 | 130,068 |

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7306.30. These data may be overstated as HTS 7306.30 may contain products outside the scope of this review.

## THE INDUSTRY IN KOREA

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from five firms, which accounted for *** of production and exports to the United States of CWP from Korea during 1989-91. During the first five-year reviews, industry publications estimated 15 firms produced CWP in Korea, of which nine provided questionnaire responses. These pipe producers exported between *** percent of their total CWP shipments to the United States during 1997-98. In the second five-year reviews, the Commission sent questionnaires to 25 possible producers of CWP in Korea and received one response (Husteel). The firm exported between *** percent of total CWP shipments to the United States during 1999-2005. During the third full five-year reivews, the Commission sent questionnaires to ten firms in Korea identified as possible producers of CWP according to parties' responses to the notice of institution, proprietary Customs data, and Commerce notices. None of the firms provided data on CWP operations. [57]

Table I-10 presents data on exports of CWP from South Korea to leading foreign markets during 2012-16. The United States was the largest export destination by quantity for CWP exports from South Korea and accounted for 31.9 percent of South Korean exports in 2016. Other major export destinations for CWP exports from South Korea included Japan and China, accounting for 26.3 percent and 8.3 percent of South Korean exports in 2016, respectively. South Korea's exports of CWP increased from 2012 to 2013, decreased from 2013 to 2015, and increased 26.7 percent from 2015 to 2016.

[57] *Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review): Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey—Staff Report,* INV-KK-060, May 29, 2012 pp. IV-27-28

**Table I-10**
**CWP: Exports of CWP from Korea, by destination, 2012-16**

| Item | Calendar year | | | | |
|---|---|---|---|---|---|
| | 2012 | 2013 | 2014 | 2015 | 2016 |
| | Quantity (short tons) | | | | |
| United States | 108,983 | 104,061 | 121,516 | 76,598 | 143,341 |
| Japan | 119,144 | 125,409 | 157,850 | 127,639 | 118,142 |
| China | 29,439 | 30,818 | 23,095 | 27,320 | 37,303 |
| Hong Kong | 16,924 | 14,561 | 21,236 | 29,741 | 20,810 |
| Mexico | 13,228 | 15,964 | 7,955 | 9,420 | 14,789 |
| United Arab Emirates | 3,708 | 4,997 | 6,562 | 9,933 | 11,537 |
| Malaysia | 1,770 | 2,288 | 2,983 | 1,815 | 9,277 |
| Thailand | 11,199 | 9,486 | 10,259 | 9,150 | 9,168 |
| Canada | 6,480 | 5,801 | 3,804 | 1,998 | 8,933 |
| India | 2,220 | 4,202 | 4,776 | 4,551 | 7,062 |
| All other | 91,938 | 133,260 | 71,306 | 56,707 | 69,392 |
| Total | 405,031 | 450,848 | 431,343 | 354,872 | 449,754 |
| | Value (1,000 dollars) | | | | |
| United States | 107,004 | 90,605 | 113,281 | 57,432 | 92,003 |
| Japan | 115,060 | 98,504 | 122,207 | 82,565 | 73,699 |
| China | 45,385 | 46,957 | 30,202 | 29,157 | 33,422 |
| Venezuela | - | 385 | 14 | 10,145 | 23,145 |
| Mexico | 19,814 | 18,662 | 12,798 | 16,057 | 18,572 |
| United Arab Emirates | 5,601 | 5,272 | 13,650 | 11,848 | 16,930 |
| Hong Kong | 14,781 | 11,325 | 15,860 | 20,120 | 11,595 |
| India | 3,755 | 6,000 | 7,777 | 7,319 | 9,298 |
| Thailand | 13,234 | 10,172 | 9,939 | 8,749 | 7,442 |
| Canada | 8,175 | 6,356 | 4,113 | 1,477 | 4,754 |
| All other | 100,227 | 130,997 | 85,539 | 64,450 | 65,843 |
| Total | 433,036 | 425,236 | 415,379 | 309,321 | 356,702 |

Notes continued on next page.

**Table I-10--Cointinued**
**CWP: Exports of CWP from Korea, by destination, 2012-16**

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7306.30. These data may be overstated as HTS 7306.30 may contain products outside the scope of this review.

## THE INDUSTRY IN MEXICO

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for *** of production and exports of CWP from Mexico during 1989-91. During the first five-year reviews, there were an estimated twenty producers of CWP in Mexico. Two producers of CWP responded to the Commission's questionnaire (Hylsa and Tuberia Nacional). These producers exported between *** percent of their total CWP shipments to the United States during 1997-98. In the second five-year reviews, the Commission sent questionnaires to 54 possible producers of CWP in Mexico, of which three producers provided data (Hylsa, Productos Laminados de Monterrer, and Tuberia Nacional). These producers exported between *** percent of their total CWP shipments to the United States during 1999-2005. In the third full five-year reviews, the Commission sent questionnaires to ten firms in Mexico identified as possible producers of CWP according to parties' responses to the notice of institution, proprietary Customs data, and Commerce notices. Three firms ***, provided questionnaire responses indicating that they did not produce or export CWP to the United States at any time since January 1, 2006. One firm, Conduit, S.A. de C.V. provided data on its CWP operations. Conduit estimated that it accounted for *** percent of total production of CWP in Mexico and *** percent of total exports of CWP to the United States in 2011. Conduit reported that ***.[58]

Table I-11 presents data on exports of CWP from Mexico to leading foreign markets during 2012-16. The United States was the largest export destination for CWP exports from Mexico in terms of quantity, and accounted for 91.1 percent of Mexico's CWP exports in 2016. Mexico's exports of CWP to the United States declined 13.1 percent during 2012-16, while total CWP exports fluctuated year to year during the review period.

[58] *Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review): Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey—Staff Report,* INV-KK-060, May 29, 2012 pp. IV-31-32

**Table I-11**
**CWP: Exports of CWP from Mexico, by destination, 2012-16**

| Item | Calendar year | | | | |
|---|---|---|---|---|---|
| | 2012 | 2013 | 2014 | 2015 | 2016 |
| **Quantity (short tons)** | | | | | |
| United States | 101,770 | 98,543 | 89,633 | 88,786 | 88,407 |
| Costa Rica | 3,677 | 4,938 | 3,972 | 3,920 | 2,729 |
| Guatemala | 788 | 1,113 | 558 | 1,790 | 1,296 |
| Brazil | 48 | 1 | 19 | 1,568 | 1,247 |
| Colombia | 261 | 1,378 | 1,631 | 1,165 | 623 |
| Honduras | 51 | 336 | 625 | 526 | 549 |
| Panama | 125 | 67 | 423 | 473 | 541 |
| Nicaragua | - | 144 | 419 | 523 | 465 |
| Cuba | 79 | 4 | 17 | 960 | 297 |
| Belize | 65 | 115 | 146 | 103 | 190 |
| All other | 1,647 | 2,298 | 2,276 | 501 | 667 |
| Total | 108,510 | 108,935 | 99,719 | 100,315 | 97,012 |
| **Value (1,000 dollars)** | | | | | |
| United States | 100,200 | 116,672 | 90,839 | 77,667 | 79,042 |
| Guatemala | 1,006 | 1,217 | 894 | 2,879 | 6,997 |
| Costa Rica | 3,567 | 4,433 | 3,890 | 3,662 | 3,009 |
| Brazil | 110 | 20 | 38 | 2,673 | 1,932 |
| Colombia | 348 | 1,617 | 2,058 | 1,330 | 703 |
| Honduras | 83 | 407 | 797 | 638 | 686 |
| Panama | 273 | 96 | 534 | 493 | 626 |
| Nicaragua | - | 177 | 719 | 606 | 532 |
| Cuba | 128 | 6 | 33 | 1,681 | 479 |
| China | 4 | 1,768 | 3,305 | 156 | 287 |
| All other | 2,827 | 2,434 | 1,235 | 766 | 1,093 |
| Total | 108,547 | 128,846 | 104,341 | 92,551 | 95,386 |

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7306.30. These data may be overstated as HTS 7306.30 may contain products outside the scope of this review.

## THE INDUSTRY IN TAIWAN

During the final phase of the original investigations concerning small-diameter pipes, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately 95 percent of exports of CWP from Taiwan during 1981-83. In the original investigations on certain circular welded non-alloy steel pipes and tubes from Taiwan, which applies to large-diameter pipes, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately *** percent of total exports to the United States in 1991. During the first five-year reviews, the Commission sent questionnaires to three possible producers of CWP in Taiwan, none of which provided responses. In the second five-year reviews, the Commission sent questionnaires to 11 possible producers of CWP in Taiwan, none of which provided responses. In the third full five-year reviews, the Commission sent questionnaires to ten firms in Taiwan identified as possible producers of CWP according to parties' responses to the notice of institution, proprietary Customs data, and Commerce notices. One firm, Tension Steel Industries Co., Ltd., provided data on its CWP operations. Tension Steel did not provide an estimate of the share of total production of CWP in Taiwan for which it accounted, but estimated that the firm's exports accounted for *** percent of total exports of CWP to the United States in 2011. Tension Steel reported that its production capacity was limited by the scale of machinery and equipment.[59]

Table I-12 presents data on exports of CWP from Taiwan to leading foreign markets during 2012-16. The United States is the largest export destination of CWP from Taiwan. In 2012, exports to the United States accounted for 7.6 percent of Taiwan's total CWP exports, and increased to 44.4 percent in 2016. Other major export destinations for CWP from Taiwan included Japan and Vietnam, which accounted for 13.8 percent and 8.5 percent of CWP exports in 2016, respectively. Total CWP exports fluctuated year to year during the review period.

[59] *Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review): Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey—Staff Report,* INV-KK-060, May 29, 2012 pp.IV-37-38

**Table I-12**
**CWP: Exports of CWP from Taiwan, by destination, 2012-16**

| Item | Calendar year | | | | |
|---|---|---|---|---|---|
| | 2012 | 2013 | 2014 | 2015 | 2016 |
| | Quantity (short tons) | | | | |
| United States | 3,321 | 2,264 | 1,972 | 10,875 | 21,633 |
| Japan | 6,246 | 5,416 | 9,577 | 5,570 | 6,711 |
| Vietnam | 5,386 | 4,168 | 6,417 | 5,207 | 4,130 |
| Thailand | 5,408 | 4,045 | 3,289 | 3,246 | 3,610 |
| China | 3,147 | 3,641 | 3,579 | 3,355 | 3,277 |
| Indonesia | 1,354 | 1,603 | 1,366 | 1,222 | 1,239 |
| New Zealand | - | 67 | 519 | 753 | 1,049 |
| Korea South | 20 | - | 304 | 966 | 875 |
| Mexico | - | - | - | 326 | 750 |
| Belgium | - | 98 | 301 | 345 | 677 |
| All other | 18,789 | 15,160 | 19,074 | 7,036 | 4,747 |
| Total | 43,670 | 36,462 | 46,398 | 38,903 | 48,698 |
| | Value (1,000 dollars) | | | | |
| United States | 3,503 | 2,066 | 1,768 | 7,844 | 11,402 |
| Japan | 5,468 | 4,238 | 7,684 | 4,417 | 4,410 |
| China | 4,448 | 4,365 | 4,506 | 4,532 | 4,303 |
| Vietnam | 5,386 | 4,194 | 6,644 | 4,688 | 3,724 |
| Thailand | 5,529 | 4,283 | 3,534 | 3,101 | 3,249 |
| Indonesia | 1,904 | 2,284 | 1,994 | 1,709 | 1,555 |
| Korea South | 34 | - | 482 | 1,442 | 1,293 |
| Mexico | - | - | - | 497 | 1,110 |
| Pakistan | 624 | 620 | 877 | 880 | 974 |
| Belgium | - | 189 | 589 | 570 | 934 |
| All other | 17,385 | 13,310 | 16,148 | 7,303 | 6,031 |
| Total | 44,281 | 35,546 | 44,227 | 36,983 | 38,987 |

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7306.30. These data may be overstated as HTS 7306.30 may contain products outside the scope of this review.

## THE INDUSTRY IN THAILAND

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from five firms, which accounted for between 0.0 and 0.7 percent of exports of CWP from Thailand during 1983-84. In the first five-year reviews, the Commission sent questionnaires to two possible producers of CWP in Thailand, of which neither provided responses to the Commission's questionnaire. In the second five-year reviews, there were an estimated four steel tube producers in Thailand, of which one (Saha Thai) provided responses to the Commission's questionnaire. Saha Thai exported between *** percent of its total CWP shipments to the United States during 1999-2005. In the third full five-year reviews, the Commission sent questionnaires to ten firms in Thailand identified as possible producers of CWP from parties' responses to the notice of institution, proprietary Customs data, and Commerce notices. One firm, Saha Thai, provided data on its CWP operations. Saha Thai estimated that it accounted for *** percent of total production of CWP in Thailand and *** percent of total exports of CWP in the United States in 2011.[60]

Table I-13 presents data on exports of CWP from Thailand to leading foreign markets during 2012-16. The United States was the largest export destination for CWP exports from Thailand and accounted for 56.9 percent of Thailand's exports in 2016. Other major export destinations for CWP from Thailand included Australia and Laos, which accounted for 23.5 percent and 3.7 percent of Thailand's exports in 2016, respectively. Thailand's total exports of CWP declined 49.2 percent from 2012 to 2014, and then increased 40.3 percent from 2014 to 2016.

[60] *Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review): Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey—Staff Report,* INV-KK-060, May 29, 2012 p. IV-42

**Table I-13**
**CWP: Exports of CWP from Thailand, by destination, 2012-16**

| Item | Calendar year | | | | |
|---|---|---|---|---|---|
| | 2012 | 2013 | 2014 | 2015 | 2016 |
| | Quantity (short tons) | | | | |
| United States | 109,632 | 39,012 | 48,630 | 51,622 | 65,054 |
| Australia | 16,054 | 13,243 | 16,169 | 15,630 | 26,844 |
| Laos | 4,459 | 2,195 | 2,040 | 5,014 | 4,284 |
| Indonesia | 4,554 | 5,277 | 5,596 | 3,058 | 3,329 |
| Myanmar | 1,896 | 1,580 | 1,293 | 1,523 | 3,009 |
| Mexico | 440 | 568 | 456 | 970 | 1,586 |
| Egypt | 664 | 593 | 678 | 1,085 | 1,506 |
| Cambodia | 64 | 71 | 76 | 31 | 1,313 |
| Canada | 11,259 | 30 | 786 | 253 | 1,232 |
| Qatar | 1,099 | 719 | 874 | 1,415 | 1,152 |
| All other | 10,463 | 20,574 | 4,963 | 5,303 | 5,105 |
| Total | 160,583 | 83,862 | 81,562 | 85,905 | 114,414 |
| | Value (1,000 dollars) | | | | |
| United States | 95,930 | 31,284 | 37,161 | 36,586 | 31,340 |
| Australia | 13,515 | 10,219 | 12,194 | 9,657 | 14,122 |
| Indonesia | 9,210 | 12,251 | 13,464 | 7,686 | 7,919 |
| Mexico | 773 | 945 | 771 | 2,369 | 4,420 |
| Laos | 6,958 | 3,333 | 3,845 | 4,517 | 3,207 |
| Egypt | 764 | 688 | 939 | 1,876 | 2,794 |
| Myanmar | 2,834 | 2,127 | 1,612 | 1,590 | 2,292 |
| Malaysia | 962 | 1,043 | 1,112 | 988 | 1,863 |
| Qatar | 1,118 | 842 | 1,045 | 1,713 | 1,452 |
| Cambodia | 58 | 71 | 85 | 36 | 1,377 |
| All other | 22,081 | 24,523 | 7,242 | 8,384 | 8,719 |
| Total | 154,145 | 87,254 | 79,468 | 75,404 | 78,129 |

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7306.30. These data may be overstated as HTS 7306.30 may contain products outside the scope of this review.

## THE INDUSTRY IN TURKEY

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from five firms, which accounted for all production of CWP from Turkey during 1985 and 1986. The firms' exports to the United States were minimal until January-September 1985 when they increased to *** short tons. In the first five-year reviews, there were an estimated 13 producers of CWP, of which one producer (Borusan Birlesik Boru Fabrikalari, A.S.) provided a response to the Commission's questionnaire. The producer exported between *** percent of its total CWP shipments to the United States during 1997-98. In the second five-year reviews, the Commission sent questionnaires to 11 possible producers of CWP in Turkey, of which four (Borusan, Erbosan Erciyas Boru Sanayii ve Ticaret, Güven Boru Profil Sanayi ve Ticaret, and Noksel) provided data. These firms exported between *** percent of their total CWP shipments to the United States during 1999-2005. In the third full five-year reviews, the Commission sent questionnaires to ten firms in Turkey identified as possible producers of CWP according to parties' responses to the notice of institution, proprietary Customs data, and Commerce notices. Three firms, Borusan, Noksel, and Toscelik Profil ve Sac Endustrisi A.S. provided data on their CWP operations. Borusan estimated that it accounted for *** percent of total production of CWPin Turkey and *** percent of total exports of CWP from Turkey to the United States in 2011. Noksel estimated that it accounted for *** percent of total production of CWP in Turkey and *** percent of total exports of CWP from Turkey to the United States in 2011. Toscelik estimated that it accounted for *** percent of total production of CWP in Turkey and *** percent of total exports of CWP from Turkey to the United States in 2011. All three responding producers reported constraints in the manufacturing process. *** reported production was constrained by stop times needed for maintenance and switching equipment during changes for size and by limited storage area. ***.[61]

In its response to the notice of institution, the Government of Turkey indicated that Turkey's subject merchandise exports to the United States declined 23 percent in terms of quantity, while Turkey's total exports increased 21 percent during 2011-16.[62]

Table I-14 presents export data for CWP from Turkey to leading foreign markets during 2012-16. The United Kingdom, Romania, and Germany were the three largest export destinations for CWP from Turkey and accounted for 14.6 percent, 10.3 percent, and 9.8 percent of Turkey's exports in 2016, respectively.

[61] *Investigation Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536, (Third Review): Certain Circular Welded Pipe and Tube from Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey—Staff Report,* INV-KK-060, May 29, 2012 pp. IV-49-IV-50.

[62] Government of Turkey's Response to the Notice of Institution, July 3, 2017, pp. 3-4.

**Table I-14**
**CWP: Exports of CWP from Turkey, by destination, 2012-16**

| Item | Calendar year | | | | |
|---|---|---|---|---|---|
| | 2012 | 2013 | 2014 | 2015 | 2016 |
| | Quantity (short tons) | | | | |
| United Kingdom | 84,891 | 61,316 | 95,133 | 86,440 | 79,107 |
| Romania | 31,437 | 29,240 | 38,958 | 46,760 | 55,869 |
| Germany | 26,606 | 28,226 | 45,403 | 44,517 | 53,309 |
| United States | 137,526 | 114,482 | 124,646 | 107,859 | 52,037 |
| Iraq | 74,918 | 80,261 | 52,364 | 46,377 | 45,080 |
| Italy | 22,189 | 25,416 | 38,147 | 41,673 | 41,191 |
| Canada | 11,118 | 19,925 | 29,938 | 23,761 | 21,780 |
| Greece | 10,476 | 17,817 | 24,397 | 19,563 | 21,425 |
| Israel | 5,546 | 12,850 | 22,953 | 18,203 | 17,750 |
| Egypt | 6,621 | 11,309 | 24,739 | 13,623 | 15,120 |
| All other | 136,011 | 139,822 | 146,562 | 152,076 | 139,208 |
| Total | 547,339 | 540,665 | 643,240 | 600,850 | 541,876 |
| | Value (1,000 dollars) | | | | |
| United Kingdom | 64,100 | 43,841 | 66,002 | 50,128 | 39,651 |
| Germany | 35,872 | 35,874 | 47,071 | 36,365 | 34,643 |
| United States | 109,001 | 82,033 | 89,088 | 69,284 | 29,611 |
| Romania | 23,087 | 20,949 | 26,958 | 25,560 | 28,431 |
| Iraq | 54,950 | 57,824 | 34,877 | 24,117 | 21,882 |
| Italy | 16,458 | 18,965 | 26,708 | 23,918 | 21,551 |
| Poland | 7,360 | 8,734 | 9,506 | 9,878 | 12,899 |
| Canada | 8,854 | 15,201 | 22,372 | 16,552 | 12,284 |
| Greece | 8,629 | 13,841 | 18,069 | 11,934 | 11,918 |
| Egypt | 5,486 | 9,964 | 22,648 | 9,533 | 9,687 |
| All other | 121,597 | 125,176 | 132,981 | 107,992 | 93,489 |
| Total | 455,394 | 432,401 | 496,280 | 385,261 | 316,046 |

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7306.30. These data may be overstated as HTS 7306.30 may contain products outside the scope of this review.

## ANTIDUMPING OR COUNTERVAILING DUTY ORDERS IN THIRD-COUNTRY MARKETS

CWP is currently subject to antidumping duties in the Australia, Canada, and the European Union.

### Australia

As of September 8, 2016, the Australian Antidumping Commission applied antidumping measures on hollow structural sections from 5 countries, including China, South Korea, Malaysia, Taiwan, and Thailand, as well as countervailing measures on hollow structural sections from China. The scope of these orders covers the following HS 6-digit subheadings: 7306.30, 7306.50, 7306.61, and 7306.69. The duties on China, South Korea, Malaysia, and Taiwan ranged from 2.4 percent to 100.8 percent and were set to expire on July 2, 2017[63], while the duties on Thailand range from 5.7 percent to 29.7 percent and are set to expire on August 18, 2020.[64]

### Canada

CWP is subject to two antidumping duty orders and one countervailing duty order in Canada. In 2013, the Canadian International Trade Tribunal ("CITT") issued antidumping duty orders equal to 179 percent of the export price and countervailing duty orders equal to 5,280 renminbi per metric ton on imports of CWP from China. The scope of this order includes:

> "carbon steel welded pipe, commonly identified as standard pipe, in the nominal size range from ½ inch up to and including 6 inches (12.7 mm to 168.3 mm in outside diameter) inclusive, in various forms and finishes, usually supplied to meet ASTM A53, ASTM A135, ASTM A252, ASTM A589, ASTM A795, ASTM FI083 or Commercial Quality, or AWWA C200-97 or equivalent specifications, including water well casing, piling pipe, sprinkler pipe and fencing pipe, but excluding oil and gas line pipe made to API specifications."[65]

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[63] As of July 26, 2017, no information is available on the status of the antidumping orders on China, South Korea, Malaysia, Taiwan, and Thailand, and the countervailing orders on China.

[64] Australian Antidumping Commission, "Goods subject to measures," http://www.adcommission.gov.au/measures/Documents/Summary%20Table%20-%20Steel%20and%20Aluminium%20Products%20-%20Measures%20Applied%20-%20By%20Tariff%20Line%20-%207%20September%202016.pdf, p. 7, (accessed July 26, 2017).

[65] Canada Border Services Agency, "Measures in Force: Carbon and Steel Welded Pipe (CSWP 1)," http://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev-eng.html, (accessed July 26, 2017).

On May 7, 2013, the Canada Border Services Agency ("CBSA") conducted a re-investigation on certain carbon steel welded pipe originating in or exported from Taiwan, India, Oman, South Korea, Thailand, and the United Arab Emirates. This re-investigation was in response to a threat of injury finding issued by the CITT on December 11, 2012. Canada applies an antidumping duty rate of 54.2 percent of the export price for all subject goods imported from these countries, unless the exporter has been issued a specific normal value. CWP from India is also subject to countervailing duties in the range of 3,577 to 23,872 Indian rupees per metric ton, unless the exporter has been issued its own subsidy rate. The scope of all of these orders is the same as the orders on CWP from China. [66]

**European Union**

In 2015, the European Commission ("EC") imposed antidumping duties on certain welded tubes and pipes of iron or non-alloy steel originating in Belarus, the People's Republic of China, Russia, Thailand, and Ukraine. Duty rates on EU imports of CWP from these subject countries range from 10.1 percent to 90.6 percent. The scope of this order includes:

> "welded tubes and pipes, of iron or non-alloy steel, of circular cross-section and of an external diameter not exceeding 168,3 mm, excluding line pipe of a kind used for oil or gas pipelines, casing and tubing of a kind used in drilling for oil and gas, precision tubes and tubes and pipes with attached fittings suitable for conducting gases or liquids for use in civil aircraft, currently falling within CN codes ex 7306 30 41, ex 7306 30 49, ex 7306 30 72 and ex 7306 30 77."[67]

On March 31, 2012, the EC initiated antidumping proceedings concerning imports of welded tubes, pipes and hollow profiles of square or rectangular cross-section, of iron other than cast iron or steel other than stainless, originating in the former Yugoslav Republic of Macedonia, Turkey and Ukraine.[68] However, the EC terminated this investigation on February 13, 2013 after the EU producers withdrew their complaint.[69]

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[66] Canada Border Services Agency, "Measures in Force: Carbon and Steel Welded Pipe 2 (CSWP 2)," http://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev-eng.html, (accessed July 20, 2017).

[67] Official Journal of the European Union, "Commission Implementing Regulation (EU) 2015/110," January 26, 2015, http://trade.ec.europa.eu/doclib/docs/2015/january/tradoc_153068.def.en.L20-2015.pdf, p. L 20/6 through L 20/8.

[68] Official Journal of the European Union, "2012/C 96/07," March 31, 2012, http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2012:096:0013:0021:EN:PDF, p. C 96/13.

[69] Official Journal of the European Union, "Commission Decision of 13 February 2013," 2013/80/EU, http://trade.ec.europa.eu/doclib/docs/2013/february/tradoc_150525.term.en.L43-2013.pdf, (accessed July 31, 2017).

Table I-13 presents the largest global export sources of CWP during 2012-16. China, Italy, and Turkey were the largest exporters of CWP in terms of quantity and accounted for 20.6 percent, 16.1 percent, and 7.8 percent of global exports during the period, respectively. China's exports increased 74.5 percent during 2012-16, while global exports increased 10.0 percent. Italy's exports of CWP increased 14.8 percent during 2012-16, while Turkey's exports fell after peaking in 2014.

**Table I-15**
**CWP: Global exports, by major sources, 2012-16**

| Item | 2012 | 2013 | 2014 | 2015 | 2016 |
|---|---|---|---|---|---|
| | | | Quantity (short tons) | | |
| China | 819,853 | 934,017 | 1,146,964 | 1,407,541 | 1,430,952 |
| Italy | 970,387 | 1,006,301 | 1,100,892 | 1,099,915 | 1,113,910 |
| Turkey | 547,339 | 540,665 | 643,240 | 600,850 | 541,876 |
| South Korea | 405,031 | 450,848 | 431,343 | 354,872 | 449,754 |
| Germany | 418,046 | 381,464 | 361,451 | 342,567 | 354,481 |
| USA | 476,743 | 403,893 | 381,935 | 334,877 | 298,461 |
| Canada | 231,189 | 235,026 | 247,571 | 259,826 | 260,196 |
| Spain | 235,833 | 234,133 | 247,913 | 191,462 | 230,426 |
| India | 110,646 | 225,547 | 245,913 | 230,610 | 209,268 |
| Russia | 138,645 | 247,636 | 248,950 | 309,844 | 194,883 |
| All other | 1,951,613 | 1,876,027 | 1,816,217 | 1,921,917 | 1,850,612 |
| Total | 6,305,326 | 6,535,558 | 6,872,390 | 7,054,282 | 6,934,818 |

Table continued on next page.

**Table I-15--Continued**
**CWP: Global exports, by major sources, 2012-16**

| Item | 2012 | 2013 | 2014 | 2015 | 2016 |
|---|---|---|---|---|---|
| | | | Value (1,000 dollars) | | |
| China | 682,514 | 734,967 | 872,421 | 945,876 | 879,827 |
| Italy | 1,045,657 | 1,061,882 | 1,122,144 | 915,124 | 859,692 |
| USA | 681,822 | 621,181 | 611,165 | 532,420 | 457,410 |
| Germany | 617,610 | 617,368 | 570,297 | 450,701 | 445,298 |
| South Korea | 433,036 | 425,236 | 415,379 | 309,321 | 356,702 |
| Turkey | 455,394 | 432,401 | 496,280 | 385,261 | 316,046 |
| Canada | 268,777 | 284,178 | 298,914 | 288,128 | 282,182 |
| Japan | 309,127 | 281,555 | 260,495 | 237,876 | 236,707 |
| Spain | 278,548 | 280,087 | 256,779 | 188,601 | 216,609 |
| Switzerland | 295,132 | 265,952 | 256,035 | 226,574 | 196,031 |
| All other | 2,072,917 | 2,139,876 | 2,053,873 | 1,788,748 | 1,581,083 |
| Total | 7,140,534 | 7,144,683 | 7,213,782 | 6,268,630 | 5,827,586 |

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HTS subheading 7306.30. These data may be overstated as HTS 7306.30 may contain products outside the scope of this review.

# 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 |
|---|---|---|
| 82 FR 25328<br>June 1, 2017 | *Certain Circular Welded Pipe and Tube From Brazil, India, Korea, Mexico, Taiwan, Thailand, and Turkey; Institution of Five-Year Reviews* | https://www.gpo.gov/fdsys/pkg/FR-2017-06-01/pdf/2017-11049.pdf |
| 82 FR 25599<br>June 2, 2017 | *Initiation of Five-Year (Sunset) Reviews* | https://www.gpo.gov/fdsys/pkg/FR-2017-06-02/pdf/2017-11419.pdf |
| 82 FR 27690<br>June 16, 2017 | *Initiation of Five-Year (Sunset) Review; Correction* | https://www.gpo.gov/fdsys/pkg/FR-2017-06-16/pdf/2017-12523.pdf |

# APPENDIX B

# COMPANY-SPECIFIC DATA

## RESPONSE CHECKLIST FOR U.S. PRODUCERS

| Item | Bull Moose Tube | EXLTUBE | TMK IPSCO | Zekelman Industries | Total |
|---|---|---|---|---|---|
| | Quantity=Short Tons; value=1,000 dollars; | | | | |
| | Unit values, unit labor costs, and unit financial data are per pound | | | | |
| **Nature of operation** | ✓ | ✓ | ✓ | ✓ | ✓ |
| **Statement of intent to participate** | ✓ | ✓ | ✓ | ✓ | ✓ |
| **Statement of likely effects of revoking the order** | ✓ | ✓ | ✓ | ✓ | ✓ |
| **U.S. producer list** | ✓ | ✓ | ✓ | ✓ | ✓ |
| **U.S. importer/foreign producer list** | ✓ | ✓ | ✓ | ✓ | ✓ |
| **List of 3-5 leading purchasers** | ✓ | ✓ | ✓ | ✓ | ✓ |
| **List of sources for national/regional prices** | ✓ | ✓ | ✓ | ✓ | ✓ |
| **Production:** | | | | | |
| **Quantity** | *** | *** | *** | *** | *** |
| **Percent of total reported** | *** | *** | *** | *** | *** |
| **Capacity** | *** | *** | *** | *** | *** |
| **Commercial shipments:** | | | | | |
| **Quantity** | *** | *** | *** | *** | *** |
| **Value** | *** | *** | *** | *** | *** |
| **Internal consumption:** | | | | | |
| **Quantity** | *** | *** | *** | *** | *** |
| **Value** | *** | *** | *** | *** | *** |
| **Net sales** | *** | *** | *** | *** | *** |
| **COGS** | *** | *** | *** | *** | *** |
| **Gross profit or (loss)** | *** | *** | -*** | *** | *** |
| **SG&A expenses (loss)** | *** | *** | *** | *** | *** |
| **Operating income/(loss)** | *** | *** | -*** | *** | *** |
| **Changes in supply/demand** | ✓ | ✓ | ✓ | ✓ | ✓ |

**Note.—The production, capacity, and shipment data presented are for calendar year 2016. The financial data are for fiscal year ended December 31, 2016.**

✓ = response provided; **×** = response not provided; **NA** = not applicable; ? = indicated that the information was not known.

**RESPONSE CHECKLIST FOR FOREIGN GOVERNMENT**

| Item | Government of Turkey | Total |
|---|---|---|
| | Quantity= Short tons; value=1,000 dollars; | |
| | Unit values, unit labor costs, and unit financial data are per pound | |
| **Nature of operation** | ✓ | ✓ |
| **Statement of intent to participate** | ✓ | ✓ |
| **Statement of likely effects of revoking the order** | ✓ | ✓ |
| **U.S. producer list** | ? | ? |
| **U.S. importer/foreign producer list** | ✓ | ✓ |
| **List of 3-5 leading purchasers** | ? | ? |
| **List of sources for national/regional prices** | ✓ | ✓ |
| **Production:** | | |
| **Quantity** | *** | *** |
| **Percent of total reported** | *** | *** |
| **Capacity** | *** | *** |
| **Exports to the United States:** | | |
| **Quantity** | *** | *** |
| **Value** | *** | *** |
| **Percent of total reported** | *** | *** |
| **Changes in supply/demand** | ✓ | ✓ |

**Note.—The production, capacity, and shipment data presented are for calendar year 2016.**

✓ = response provided; **×** = response not provided; **NA** = not applicable; ? = indicated that the information was not known.

# APPENDIX C

# SUMMARY DATA COMPILED IN PRIOR INVESTIGATIONS

**Table C-1**
**Circular welded pipe and tube: Summary data concerning the U.S. market, 2006-11**

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

| | Reported data | | | | | | Period changes | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Item | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2006-11 | 2006-07 | 2007-08 | 2008-09 | 2009-10 | 2010-11 |
| U.S. consumption quantity: | | | | | | | | | | | | |
| Amount | 2,409,802 | 2,266,826 | 1,928,401 | 1,237,088 | 1,405,519 | 1,472,635 | -38.9 | -5.9 | -14.9 | -35.8 | 13.6 | 4.8 |
| Producers' share (1) | 51.1 | 56.2 | 64.3 | 71.3 | 65.6 | 65.6 | 14.5 | 5.2 | 8.0 | 7.0 | -5.7 | 0.0 |
| Importers' share (1): | | | | | | | | | | | | |
| Brazil | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| India (Subject) | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Korea | 1.8 | 1.4 | 6.4 | 3.1 | 5.4 | 3.3 | 1.4 | -0.5 | 5.0 | -3.3 | 2.3 | -2.1 |
| Mexico | 3.1 | 2.9 | 2.7 | 5.4 | 4.5 | 4.5 | 1.4 | -0.2 | -0.2 | 2.7 | -0.9 | 0.0 |
| Taiwan | 1.8 | 1.5 | 3.9 | 0.6 | 2.0 | 1.6 | -0.2 | -0.3 | 2.4 | -3.3 | 1.4 | -0.4 |
| Thailand | 3.2 | 2.1 | 4.4 | 2.5 | 2.0 | 3.2 | 0.0 | -1.1 | 2.3 | -1.9 | -0.5 | 1.2 |
| Turkey | 1.3 | 0.1 | 2.8 | 2.1 | 2.6 | 2.2 | 0.8 | -1.2 | 2.6 | -0.7 | 0.5 | -0.5 |
| Subtotal, Subject | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Subtotal, Nonsubject | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Total imports | 48.9 | 43.8 | 35.7 | 28.7 | 34.4 | 34.4 | -14.5 | -5.2 | -8.0 | -7.0 | 5.7 | 0.0 |
| U.S. consumption value: | | | | | | | | | | | | |
| Amount | 1,958,107 | 1,876,439 | 2,230,487 | 1,099,599 | 1,332,584 | 1,549,330 | -20.9 | -4.2 | 18.9 | -50.7 | 21.2 | 16.3 |
| Producers' share (1) | 62.1 | 64.2 | 68.2 | 71.6 | 67.4 | 67.4 | 5.2 | 2.0 | 4.0 | 3.4 | -4.2 | 0.0 |
| Importers' share (1): | | | | | | | | | | | | |
| Brazil | 0.0 | 0.0 | 0.1 | 0.1 | 0.1 | 0.1 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| India (Subject) | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Korea | 1.8 | 1.5 | 5.7 | 3.1 | 5.1 | 3.3 | 1.5 | -0.3 | 4.1 | -2.6 | 2.1 | -1.8 |
| Mexico | 3.1 | 2.8 | 2.6 | 4.5 | 3.9 | 4.1 | 1.0 | -0.3 | -0.2 | 1.8 | -0.5 | 0.2 |
| Taiwan | 1.3 | 1.2 | 3.2 | 0.7 | 1.7 | 1.4 | 0.0 | -0.2 | 2.0 | -2.5 | 1.0 | -0.3 |
| Thailand | 2.7 | 2.0 | 4.0 | 2.8 | 2.0 | 3.0 | 0.3 | -0.7 | 2.1 | -1.2 | -0.8 | 1.0 |
| Turkey | 1.1 | 0.2 | 2.6 | 2.2 | 2.3 | 1.9 | 0.9 | -0.9 | 2.4 | -0.5 | 0.1 | -0.3 |
| Subtotal, Subject | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Subtotal, Nonsubject | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Total imports | 37.9 | 35.8 | 31.8 | 28.4 | 32.6 | 32.6 | -5.2 | -2.0 | -4.0 | -3.4 | 4.2 | 0.0 |
| U.S. imports from: | | | | | | | | | | | | |
| Brazil: | | | | | | | | | | | | |
| Quantity | 570 | 386 | 555 | 490 | 622 | 401 | -29.6 | -32.3 | 43.8 | -11.7 | 26.9 | -35.5 |
| Value | 841 | 696 | 1,288 | 1,059 | 1,394 | 1,041 | 23.8 | -17.2 | 85.1 | -17.8 | 31.6 | -25.3 |
| Unit value | $1,475 | $1,803 | $2,321 | $2,161 | $2,241 | $2,596 | 75.9 | 22.2 | 28.7 | -6.9 | 3.7 | 15.8 |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| India (Subject): | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Korea: | | | | | | | | | | | | |
| Quantity | 44,348 | 31,437 | 123,952 | 38,833 | 75,857 | 48,054 | 8.4 | -29.1 | 294.3 | -68.7 | 95.3 | -36.7 |
| Value | 35,399 | 29,031 | 126,895 | 33,714 | 68,178 | 51,190 | 44.6 | -18.0 | 337.1 | -73.4 | 102.2 | -24.9 |
| Unit value | $798 | $923 | $1,024 | $868 | $899 | $1,065 | 33.5 | 15.7 | 10.9 | -15.2 | 3.5 | 18.5 |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Mexico: | | | | | | | | | | | | |
| Quantity | 74,808 | 64,935 | 52,245 | 66,813 | 63,151 | 66,017 | -11.8 | -13.2 | -19.5 | 27.9 | -5.5 | 4.5 |
| Value | 61,461 | 52,858 | 58,380 | 49,111 | 52,473 | 63,670 | 3.6 | -14.0 | 10.4 | -15.9 | 6.8 | 21.3 |
| Unit value | $822 | $814 | $1,117 | $735 | $831 | $964 | 17.4 | -0.9 | 37.3 | -34.2 | 13.0 | 16.1 |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Taiwan: | | | | | | | | | | | | |
| Quantity | 43,038 | 33,306 | 75,017 | 7,600 | 27,621 | 22,966 | -46.6 | -22.6 | 125.2 | -89.9 | 263.4 | -16.9 |
| Value | 26,302 | 22,296 | 70,947 | 7,871 | 22,370 | 20,989 | -20.2 | -15.2 | 218.2 | -88.9 | 184.2 | -6.2 |
| Unit value | $611 | $669 | $946 | $1,036 | $810 | $914 | 49.5 | 9.5 | 41.3 | 9.5 | -21.8 | 12.8 |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Thailand: | | | | | | | | | | | | |
| Quantity | 77,832 | 47,736 | 85,760 | 31,399 | 28,751 | 47,696 | -38.7 | -38.7 | 79.7 | -63.4 | -8.4 | 65.9 |
| Value | 52,738 | 36,736 | 89,600 | 30,594 | 26,785 | 46,507 | -11.8 | -30.3 | 143.9 | -65.9 | -12.5 | 73.6 |
| Unit value | $678 | $770 | $1,045 | $974 | $932 | $975 | 43.9 | 13.6 | 35.8 | -6.7 | -4.4 | 4.7 |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Turkey: | | | | | | | | | | | | |
| Quantity | 31,797 | 3,146 | 53,583 | 26,032 | 37,225 | 31,723 | -0.2 | -90.1 | 1603.2 | -51.4 | 43.0 | -14.8 |
| Value | 21,087 | 3,295 | 58,346 | 23,731 | 30,399 | 30,124 | 42.9 | -84.4 | 1670.7 | -59.3 | 28.1 | -0.9 |
| Unit value | $663 | $1,047 | $1,089 | $912 | $817 | $950 | 43.2 | 57.9 | 4.0 | -16.3 | -10.4 | 16.3 |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Subtotal (Subject): | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Subtotal (Nonsubject): | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| All sources: | | | | | | | | | | | | |
| Quantity | 1,179,398 | 991,842 | 688,846 | 355,658 | 483,675 | 506,620 | -57.0 | -15.9 | -30.5 | -48.4 | 36.0 | 4.7 |
| Value | 741,189 | 672,368 | 709,014 | 312,059 | 434,328 | 505,746 | -31.8 | -9.3 | 5.5 | -56.0 | 39.2 | 16.4 |
| Unit value | $628 | $678 | $1,029 | $877 | $898 | $998 | 58.8 | 7.9 | 51.8 | -14.8 | 2.3 | 11.2 |
| Ending inventory quantity | 15,151 | 2,767 | 21,954 | 11,487 | 9,511 | 13,425 | -11.4 | -81.7 | 693.4 | -47.7 | -17.2 | 41.2 |

Table continued on next page.

**Table C-1--Continued**
**Circular welded pipe and tube: Summary data concerning the U.S. market, 2006-11**

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

| | Reported data | | | | | | Period changes | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Item | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2006-11 | 2006-07 | 2007-08 | 2008-09 | 2009-10 | 2010-11 |
| U.S. producers': | | | | | | | | | | | | |
| Average capacity quantity | 2,088,327 | 2,009,829 | 1,944,986 | 1,938,832 | 2,009,753 | 2,054,223 | -1.6 | -3.8 | -3.2 | -0.3 | 3.7 | 2.2 |
| Production quantity | 1,282,325 | 1,282,391 | 1,212,165 | 899,463 | 968,312 | 1,023,578 | -20.2 | 0.0 | -5.5 | -25.8 | 7.7 | 5.7 |
| Capacity utilization (1) | 61.4 | 63.8 | 62.3 | 46.4 | 48.2 | 49.8 | -11.6 | 2.4 | -1.5 | -15.9 | 1.8 | 1.6 |
| U.S. shipments: | | | | | | | | | | | | |
| Quantity | 1,230,404 | 1,274,984 | 1,239,555 | 881,430 | 921,844 | 966,015 | -21.5 | 3.6 | -2.8 | -28.9 | 4.6 | 4.8 |
| Value | 1,216,918 | 1,204,071 | 1,521,473 | 787,540 | 898,256 | 1,043,584 | -14.2 | -1.1 | 26.4 | -48.2 | 14.1 | 16.2 |
| Unit value | $989 | $944 | $1,227 | $893 | $974 | $1,080 | 9.2 | -4.5 | 30.0 | -27.2 | 9.1 | 10.9 |
| Export shipments: | | | | | | | | | | | | |
| Quantity | 33,387 | 47,103 | 38,192 | 39,331 | 45,650 | 54,556 | 63.4 | 41.1 | -18.9 | 3.0 | 16.1 | 19.5 |
| Value | 30,728 | 43,305 | 49,907 | 33,390 | 42,215 | 58,615 | 90.8 | 40.9 | 15.2 | -33.1 | 26.4 | 38.8 |
| Unit value | $920 | $919 | $1,307 | $849 | $925 | $1,074 | 16.7 | -0.1 | 42.1 | -35.0 | 8.9 | 16.2 |
| Ending inventory quantity | 193,218 | 168,394 | 151,707 | 139,243 | 142,504 | 151,164 | -21.8 | -12.8 | -9.9 | -8.2 | 2.3 | 6.1 |
| Inventories/total shipments (1) | 15.3 | 12.7 | 11.9 | 15.1 | 14.7 | 14.8 | -0.5 | -2.6 | -0.9 | 3.2 | -0.4 | 0.1 |
| Production workers | 2,192 | 2,032 | 1,906 | 1,589 | 1,451 | 1,549 | -29.3 | -7.3 | -6.2 | -16.6 | -8.7 | 6.8 |
| Hours worked (1,000s) | 4,555 | 4,191 | 4,343 | 2,893 | 3,074 | 3,397 | -25.4 | -8.0 | 3.6 | -33.4 | 6.3 | 10.5 |
| Wages paid ($1,000s) | 99,169 | 96,098 | 101,721 | 73,328 | 80,361 | 96,222 | -3.0 | -3.1 | 5.9 | -27.9 | 9.6 | 19.7 |
| Hourly wages | $21.77 | $22.93 | $23.42 | $25.35 | $26.14 | $28.33 | 30.1 | 5.3 | 2.2 | 8.2 | 3.1 | 8.4 |
| Productivity (tons/1,000 hours) | 281.5 | 306.0 | 279.1 | 310.3 | 315.0 | 301.3 | 7.0 | 8.7 | -8.8 | 11.2 | 1.5 | -4.3 |
| Unit labor costs | $77.34 | $74.94 | $83.92 | $81.52 | $82.99 | $94.01 | 21.6 | -3.1 | 12.0 | -2.9 | 1.8 | 13.3 |
| Net sales: | | | | | | | | | | | | |
| Quantity | 1,361,747 | 1,321,492 | 1,425,103 | 900,288 | 949,647 | 1,016,377 | -25.4 | -3.0 | 7.8 | -36.8 | 5.5 | 7.0 |
| Value | 1,281,582 | 1,218,151 | 1,719,099 | 858,849 | 914,734 | 1,075,973 | -16.0 | -4.9 | 41.1 | -50.0 | 6.5 | 17.6 |
| Unit value | $941 | $922 | $1,206 | $954 | $963 | $1,059 | 12.5 | -2.1 | 30.9 | -20.9 | 1.0 | 9.9 |
| Cost of goods sold (COGS) | 1,076,829 | 1,103,506 | 1,351,533 | 900,451 | 806,893 | 950,989 | -11.7 | 2.5 | 22.5 | -33.4 | -10.4 | 17.9 |
| Gross profit or (loss) | 204,753 | 114,645 | 367,566 | -41,602 | 107,841 | 124,984 | -39.0 | -44.0 | 220.6 | (3) | (3) | 15.9 |
| SG&A expenses | 61,301 | 74,710 | 96,564 | 84,972 | 73,543 | 93,915 | 53.2 | 21.9 | 29.3 | -12.0 | -13.5 | 27.7 |
| Operating income or (loss) | 143,452 | 39,935 | 271,002 | -126,574 | 34,298 | 31,069 | -78.3 | -72.2 | 578.6 | (3) | (3) | -9.4 |
| Capital expenditures | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit COGS | $791 | $835 | $948 | $1,000 | $850 | $936 | 18.3 | 5.6 | 13.6 | 5.5 | -15.0 | 10.1 |
| Unit SG&A expenses | $45 | $57 | $68 | $94 | $77 | $92 | 105.3 | 25.6 | 19.9 | 39.3 | -17.9 | 19.3 |
| Unit operating income or (loss) | $105 | $30 | $190 | -$141 | $36 | $31 | -71.0 | -71.3 | 529.3 | (3) | (3) | -15.4 |
| COGS/sales (1) | 84.0 | 90.6 | 78.6 | 104.8 | 88.2 | 88.4 | 4.4 | 6.6 | -12.0 | 26.2 | -16.6 | 0.2 |
| Operating income or (loss)/ sales (1) | 11.2 | 3.3 | 15.8 | -14.7 | 3.7 | 2.9 | -8.3 | -7.9 | 12.5 | -30.5 | 18.5 | -0.9 |

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Not applicable.
(3) When there are negative values, going through the zero point, from a positive number to a negative one or from a negative one to a positive one, can distort the percentage calculations.

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, official Commerce statistics, Customs data, and Cansim (Canada) data.

**Table C-1**
**Circular welded pipe and tube: Summary data concerning the U.S. market, 1999-2005**

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

| | Reported data | | | | | | | Period changes | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Item | 1999 | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 1999-2005 | 1999-2000 | 2000-2001 | 2001-2002 | 2002-2003 | 2003-2004 | 2004-2005 |
| U.S. consumption quantity: | | | | | | | | | | | | | | |
| Amount | 2,348 | 2,777 | 2,519 | 2,236 | 2,064 | 2,422 | 2,339 | -0.4 | 18.2 | -9.3 | -11.2 | -7.7 | 17.4 | -3.4 |
| Producers' share (1) | 72.2 | 63.2 | 66.5 | 66.4 | 66.2 | 60.2 | 56.0 | -16.2 | -9.0 | 3.3 | -0.0 | -0.2 | -6.0 | -4.2 |
| Importers' share (1): | | | | | | | | | | | | | | |
| Brazil | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| India | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Korea | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Mexico | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Thailand | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Subtotal | 10.1 | 13.6 | 11.7 | 13.8 | 8.9 | 9.2 | 7.5 | -2.6 | 3.5 | -1.9 | 2.1 | -4.9 | 0.3 | -1.7 |
| All other sources | 17.7 | 23.3 | 21.8 | 19.8 | 24.9 | 30.5 | 36.5 | 18.7 | 5.5 | -1.4 | -2.1 | 5.1 | 5.7 | 5.9 |
| Total imports | 27.8 | 36.8 | 33.5 | 33.6 | 33.8 | 39.8 | 44.0 | 16.2 | 9.0 | -3.3 | 0.0 | 0.2 | 6.0 | 4.2 |
| U.S. consumption value: | | | | | | | | | | | | | | |
| Amount | 1,257,304 | 1,474,994 | 1,266,218 | 1,154,799 | 1,167,870 | 1,854,804 | 1,994,144 | 58.6 | 17.3 | -14.2 | -8.8 | 1.1 | 58.8 | 7.5 |
| Producers' share (1) | 74.7 | 66.5 | 70.5 | 69.2 | 69.4 | 65.3 | 60.8 | -13.9 | -8.3 | 4.0 | -1.3 | 0.2 | -4.1 | -4.5 |
| Importers' share (1): | | | | | | | | | | | | | | |
| Brazil | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| India | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Korea | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Mexico | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Thailand | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Turkey | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Subtotal | 7.8 | 11.0 | 9.0 | 10.7 | 8.0 | 7.0 | 6.5 | -1.3 | 3.2 | -2.0 | 1.7 | -2.7 | -0.9 | -0.5 |
| All other sources | 17.5 | 22.5 | 20.5 | 20.1 | 22.6 | 27.7 | 32.7 | 15.2 | 5.1 | -2.1 | -0.4 | 2.6 | 5.1 | 5.0 |
| Total imports | 25.3 | 33.5 | 29.5 | 30.8 | 30.6 | 34.7 | 39.2 | 13.9 | 8.3 | -4.0 | 1.3 | -0.2 | 4.1 | 4.5 |
| U.S. imports from: | | | | | | | | | | | | | | |
| Brazil: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| India: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Korea: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Mexico: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Taiwan: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Thailand: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Turkey: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Subtotal (subject): | | | | | | | | | | | | | | |
| Quantity | 237 | 376 | 294 | 308 | 184 | 223 | 176 | -25.8 | 59.1 | -21.8 | 4.6 | -40.3 | 21.4 | -21.3 |
| Value | 98,089 | 162,147 | 114,419 | 123,627 | 92,989 | 130,572 | 129,786 | 32.3 | 65.3 | -29.4 | 8.0 | -24.8 | 40.4 | -0.6 |
| Unit value | $414 | $431 | $389 | $401 | $506 | $585 | $739 | 78.4 | 3.9 | -9.7 | 3.3 | 26.0 | 15.6 | 26.4 |
| Ending inventory quantity | 2 | 2 | 3 | 2 | 2 | 3 | 3 | 91.0 | 9.3 | 57.4 | -31.6 | 20.8 | 5.0 | 28.0 |
| All other sources: | | | | | | | | | | | | | | |
| Quantity | 416 | 646 | 550 | 442 | 513 | 740 | 853 | 104.8 | 55.1 | -14.8 | -19.6 | 16.0 | 44.1 | 15.3 |
| Value | 219,634 | 332,426 | 259,002 | 231,602 | 264,078 | 513,122 | 651,863 | 196.8 | 51.4 | -22.1 | -10.6 | 14.0 | 94.3 | 27.0 |
| Unit value | $527 | $515 | $471 | $523 | $514 | $694 | $764 | 44.9 | -2.4 | -8.6 | 11.2 | -1.7 | 34.8 | 10.2 |
| Ending inventory quantity | 1 | 1 | 0 | 0 | 0 | 2 | 7 | 737.5 | -37.5 | -80.0 | -100.0 | (2) | (2) | 219.0 |
| All sources: | | | | | | | | | | | | | | |
| Quantity | 653 | 1,022 | 845 | 750 | 697 | 963 | 1,028 | 57.4 | 56.6 | -17.4 | -11.2 | -7.1 | 38.1 | 6.8 |
| Value | 317,723 | 494,573 | 373,421 | 355,229 | 357,067 | 643,693 | 781,648 | 146.0 | 55.7 | -24.5 | -4.9 | 0.5 | 80.3 | 21.4 |
| Unit value | $487 | $484 | $442 | $473 | $512 | $668 | $760 | 56.3 | -0.6 | -8.6 | 7.1 | 8.2 | 30.5 | 13.7 |
| Ending inventory quantity | 2 | 2 | 3 | 2 | 2 | 5 | 10 | 300.0 | -5.9 | 27.9 | -33.9 | 20.8 | 93.3 | 115.2 |

Table continued on next page.

**Table C-1--Continued**
**Circular welded pipe and tube: Summary data concerning the U.S. market, 1999-2005**

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

| | Reported data | | | | | | | Period changes | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Item | 1999 | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 1999-2005 | 1999-2000 | 2000-2001 | 2001-2002 | 2002-2003 | 2003-2004 | 2004-2005 |
| U.S. producers': | | | | | | | | | | | | | | |
| Average capacity quantity | 2,926 | 2,883 | 2,640 | 2,510 | 2,601 | 2,661 | 2,629 | -10.1 | -1.5 | -8.4 | -4.9 | 3.6 | 2.3 | -1.2 |
| Production quantity | 1,739 | 1,814 | 1,686 | 1,541 | 1,355 | 1,513 | 1,325 | -23.8 | 4.3 | -7.1 | -8.6 | -12.1 | 11.7 | -12.4 |
| Capacity utilization (1) | 59.4 | 62.9 | 63.8 | 61.4 | 52.1 | 56.9 | 50.4 | -9.0 | 3.5 | 0.9 | -2.4 | -9.3 | 4.8 | -6.4 |
| U.S. shipments: | | | | | | | | | | | | | | |
| Quantity | 1,695 | 1,754 | 1,674 | 1,485 | 1,367 | 1,459 | 1,310 | -22.7 | 3.5 | -4.6 | -11.3 | -8.0 | 6.8 | -10.2 |
| Value | 939,581 | 980,421 | 892,797 | 799,570 | 810,803 | 1,211,111 | 1,212,496 | 29.0 | 4.3 | -8.9 | -10.4 | 1.4 | 49.4 | 0.1 |
| Unit value | $554 | $559 | $533 | $538 | $593 | $830 | $925 | 66.9 | 0.8 | -4.6 | 1.0 | 10.2 | 39.9 | 11.5 |
| Export shipments: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 212 | 240 | 217 | 217 | 183 | 196 | 152 | -28.2 | 13.4 | -9.8 | -0.0 | -15.5 | 7.2 | -22.5 |
| Inventories/total shipments (1) | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Production workers | 2,580 | 2,610 | 2,745 | 2,747 | 2,125 | 2,331 | 2,046 | -20.7 | 1.2 | 5.2 | 0.1 | -22.6 | 9.7 | -12.2 |
| Hours worked (1,000s) | 5,427 | 5,664 | 5,864 | 5,318 | 4,611 | 4,675 | 4,097 | -24.5 | 4.4 | 3.5 | -9.3 | -13.3 | 1.4 | -12.4 |
| Wages paid ($1,000s) | 89,972 | 96,381 | 98,432 | 96,944 | 85,182 | 90,494 | 79,992 | -11.1 | 7.1 | 2.1 | -1.5 | -12.1 | 6.2 | -11.6 |
| Hourly wages | $16.58 | $17.02 | $16.79 | $18.23 | $18.47 | $19.36 | $19.53 | 17.8 | 2.6 | -1.3 | 8.6 | 1.3 | 4.8 | 0.9 |
| Productivity (tons per hour) | 0.320 | 0.320 | 0.287 | 0.290 | 0.294 | 0.324 | 0.323 | 1.1 | 0.0 | -10.1 | 0.8 | 1.4 | 10.1 | -0.1 |
| Unit labor costs | $52 | $53 | $58 | $63 | $63 | $60 | $60 | 16.5 | 2.6 | 9.8 | 7.7 | -0.1 | -4.9 | 0.9 |
| Net sales: | | | | | | | | | | | | | | |
| Quantity | 1,729 | 1,801 | 1,712 | 1,470 | 1,401 | 1,499 | 1,348 | -22.0 | 4.1 | -4.9 | -14.1 | -4.7 | 7.0 | -10.1 |
| Value | 959,174 | 1,007,248 | 915,465 | 795,982 | 834,561 | 1,243,926 | 1,245,783 | 29.9 | 5.0 | -9.1 | -13.1 | 4.8 | 49.1 | 0.1 |
| Unit value | $555 | $559 | $535 | $541 | $596 | $830 | $924 | 66.6 | 0.8 | -4.4 | 1.2 | 10.0 | 39.3 | 11.3 |
| Cost of goods sold (COGS) | 788,301 | 865,003 | 790,334 | 670,514 | 739,311 | 1,013,441 | 1,063,038 | 34.9 | 9.7 | -8.6 | -15.2 | 10.3 | 37.1 | 4.9 |
| Gross profit or (loss) | 170,873 | 142,245 | 125,131 | 125,468 | 95,250 | 230,485 | 182,745 | 6.9 | -16.8 | -12.0 | 0.3 | -24.1 | 142.0 | -20.7 |
| SG&A expenses | 72,171 | 73,221 | 80,677 | 61,147 | 57,818 | 84,110 | 73,528 | 1.9 | 1.5 | 10.2 | -24.2 | -5.4 | 45.5 | -12.6 |
| Operating income or (loss) | 98,702 | 69,024 | 44,454 | 64,321 | 37,432 | 146,375 | 109,217 | 10.7 | -30.1 | -35.6 | 44.7 | -41.8 | 291.0 | -25.4 |
| Capital expenditures | 33,644 | 23,253 | 18,374 | 37,606 | 29,085 | 23,314 | 31,166 | -7.4 | -30.9 | -21.0 | 104.7 | -22.7 | -19.8 | 33.7 |
| Unit COGS | $456 | $480 | $462 | $456 | $528 | $676 | $788 | 72.9 | 5.4 | -3.9 | -1.2 | 15.7 | 28.1 | 16.6 |
| Unit SG&A expenses | $42 | $41 | $47 | $42 | $41 | $56 | $55 | 30.6 | -2.6 | 15.9 | -11.8 | -0.8 | 36.0 | -2.8 |
| Unit operating income or (loss) | $57 | $38 | $26 | $44 | $27 | $98 | $81 | 41.9 | -32.8 | -32.2 | 68.5 | -38.9 | 265.4 | -17.0 |
| COGS/sales (1) | 82.2 | 85.9 | 86.3 | 84.2 | 88.6 | 81.5 | 85.3 | 3.1 | 3.7 | 0.5 | -2.1 | 4.3 | -7.1 | 3.9 |
| Operating income or (loss)/ sales (1) | 10.3 | 6.9 | 4.9 | 8.1 | 4.5 | 11.8 | 8.8 | -1.5 | -3.4 | -2.0 | 3.2 | -3.6 | 7.3 | -3.0 |

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) 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, official Commerce statistics, Customs data, and Cansim (Canada) data.

**Table C-2**
**LWR pipe and tube: Summary data concerning the U.S. market, 1999-2005**

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

| | Reported data | | | | | | | Period changes | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Item | 1999 | 2000 | 2001 | 2002 | 2003 | 2004 | 2005 | 1999-2005 | 1999-2000 | 2000-2001 | 2001-2002 | 2002-2003 | 2003-2004 | 2004-2005 |
| U.S. consumption quantity: | | | | | | | | | | | | | | |
| Amount | 749 | 746 | 668 | 787 | 793 | 763 | 792 | 5.8 | -0.5 | -10.4 | 17.9 | 0.7 | -3.7 | 3.8 |
| Producers' share (1) | 69.8 | 67.3 | 66.5 | 62.6 | 63.4 | 63.7 | 57.4 | -12.4 | -2.5 | -0.8 | -3.9 | 0.7 | 0.3 | -6.3 |
| Importers' share (1): | | | | | | | | | | | | | | |
| Argentina | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | -0.0 | 0.0 | -0.0 | 0.0 | 0.0 |
| Taiwan | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | -0.0 | -0.0 | -0.0 | 0.0 | 0.0 | 0.0 |
| Subtotal | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | -0.0 | -0.0 | -0.0 | -0.0 | 0.0 | 0.0 |
| All other sources | 30.2 | 32.7 | 33.5 | 37.4 | 36.6 | 36.3 | 42.6 | 12.3 | 2.5 | 0.8 | 3.9 | -0.7 | -0.3 | 6.3 |
| Total imports | 30.2 | 32.7 | 33.5 | 37.4 | 36.6 | 36.3 | 42.6 | 12.4 | 2.5 | 0.8 | 3.9 | -0.7 | -0.3 | 6.3 |
| U.S. consumption value: | | | | | | | | | | | | | | |
| Amount | 403,990 | 423,193 | 352,957 | 422,226 | 437,124 | 649,020 | 691,926 | 71.3 | 4.8 | -16.6 | 19.6 | 3.5 | 48.5 | 6.6 |
| Producers' share (1) | 74.5 | 71.1 | 70.4 | 66.6 | 67.6 | 67.5 | 61.4 | -13.1 | -3.4 | -0.7 | -3.8 | 1.0 | -0.1 | -6.1 |
| Importers' share (1): | | | | | | | | | | | | | | |
| Argentina | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | -0.0 | 0.0 | -0.0 | 0.0 | 0.0 |
| Taiwan | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.1 | 0.0 | -0.0 | -0.0 | -0.0 | 0.0 | 0.0 | 0.0 |
| Subtotal | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.1 | 0.0 | -0.0 | -0.0 | -0.0 | -0.0 | 0.0 | 0.0 |
| All other sources | 25.5 | 28.9 | 29.6 | 33.4 | 32.4 | 32.5 | 38.5 | 13.0 | 3.4 | 0.7 | 3.8 | -1.0 | 0.0 | 6.1 |
| Total imports | 25.5 | 28.9 | 29.6 | 33.4 | 32.4 | 32.5 | 38.6 | 13.1 | 3.4 | 0.7 | 3.8 | -1.0 | 0.1 | 6.1 |
| U.S. imports from: | | | | | | | | | | | | | | |
| Argentina: | | | | | | | | | | | | | | |
| Quantity | 0 | 0.003 | 0 | 0.014 | 0 | 0 | 0 | (2) | (2) | -100.0 | (2) | -100.0 | (2) | (2) |
| Value | 0 | 6 | 0 | 7 | 0 | 0 | 0 | (2) | (2) | -100.0 | (2) | -100.0 | (2) | (2) |
| Unit value | (2) | $2,068 | (2) | $483 | (2) | (2) | (2) | (2) | (2) | (2) | (2) | (2) | (2) | (2) |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0 | 0 | 0 | (2) | (2) | (2) | (2) | (2) | (2) | (2) |
| Taiwan: | | | | | | | | | | | | | | |
| Quantity | 0.077 | 0.023 | 0.013 | 0 | 0 | 0.059 | 0.277 | 258.4 | -69.9 | -43.1 | -100.0 | (2) | (2) | 372.0 |
| Value | 132 | 48 | 6 | 0 | 0 | 98 | 441 | 233.0 | -63.8 | -86.6 | -100.0 | (2) | (2) | 352.2 |
| Unit value | $1,713 | $2,062 | $484 | (2) | (2) | $1,661 | $1,592 | -7.1 | 20.3 | -76.5 | (2) | (2) | (2) | -4.2 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0 | 0 | 0 | (2) | (2) | (2) | (2) | (2) | (2) | (2) |
| Subtotal (subject): | | | | | | | | | | | | | | |
| Quantity | 0.077 | 0.026 | 0.013 | 0.014 | 0 | 0.059 | 0.277 | 258.4 | -66.1 | -49.5 | 7.8 | -100.0 | (2) | 372.0 |
| Value | 132 | 54 | 6 | 7 | 0 | 98 | 441 | 233.0 | -59.2 | -88.1 | 7.5 | -100.0 | (2) | 352.2 |
| Unit value | $1,713 | $2,063 | $484 | $483 | (2) | $1,661 | $1,592 | -7.1 | 20.4 | -76.5 | -0.3 | (2) | (2) | -4.2 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0 | 0 | 0 | (2) | (2) | (2) | (2) | (2) | (2) | (2) |
| All other sources: | | | | | | | | | | | | | | |
| Quantity | 227 | 244 | 224 | 294 | 290 | 277 | 337 | 48.9 | 7.6 | -8.2 | 31.4 | -1.3 | -4.6 | 21.8 |
| Value | 103,032 | 122,291 | 104,642 | 141,019 | 141,739 | 210,700 | 266,654 | 158.8 | 18.7 | -14.4 | 34.8 | 0.5 | 48.7 | 26.6 |
| Unit value | $455 | $502 | $468 | $479 | $488 | $761 | $790 | 73.8 | 10.3 | -6.8 | 2.5 | 1.8 | 55.8 | 3.9 |
| Ending inventory quantity | 1 | 1 | 1 | 1 | 0 | 1 | 1 | -13.8 | 4.3 | -22.3 | 38.3 | -97.7 | 3,566.7 | -9.1 |
| All sources: | | | | | | | | | | | | | | |
| Quantity | 227 | 244 | 224 | 294 | 290 | 277 | 338 | 49.0 | 7.6 | -8.2 | 31.4 | -1.3 | -4.6 | 21.8 |
| Value | 103,165 | 122,345 | 104,648 | 141,026 | 141,739 | 210,798 | 267,095 | 158.9 | 18.6 | -14.5 | 34.8 | 0.5 | 48.7 | 26.7 |
| Unit value | $455 | $502 | $468 | $479 | $488 | $761 | $791 | 73.8 | 10.2 | -6.8 | 2.5 | 1.8 | 55.8 | 4.0 |
| Ending inventory quantity | 1 | 1 | 1 | 1 | 0 | 1 | 1 | -13.8 | 4.3 | -22.3 | 38.3 | -97.7 | 3,566.7 | -9.1 |
| U.S. producers': | | | | | | | | | | | | | | |
| Average capacity quantity | 901 | 893 | 894 | 924 | 883 | 891 | 886 | -1.6 | -0.9 | 0.1 | 3.4 | -4.5 | 0.9 | -0.5 |
| Production quantity | 544 | 518 | 450 | 507 | 503 | 488 | 451 | -17.1 | -4.7 | -13.2 | 12.7 | -0.7 | -3.0 | -7.6 |
| Capacity utilization (1) | 60.3 | 58.0 | 50.3 | 54.8 | 57.0 | 54.8 | 50.9 | -9.5 | -2.3 | -7.7 | 4.5 | 2.2 | -2.2 | -3.9 |
| U.S. shipments: | | | | | | | | | | | | | | |
| Quantity | 523 | 502 | 444 | 493 | 502 | 486 | 455 | -13.0 | -4.0 | -11.5 | 11.0 | 1.9 | -3.2 | -6.4 |
| Value | 300,825 | 300,848 | 248,309 | 281,200 | 295,385 | 438,222 | 424,830 | 41.2 | 0.0 | -17.5 | 13.2 | 5.0 | 48.4 | -3.1 |
| Unit value | $576 | $600 | $559 | $570 | $588 | $902 | $934 | 62.3 | 4.2 | -6.7 | 2.0 | 3.1 | 53.3 | 3.6 |
| Export shipments: | | | | | | | | | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 66 | 73 | 66 | 73 | 69 | 66 | 60 | -8.6 | 10.1 | -8.7 | 10.9 | -5.8 | -4.7 | -8.5 |
| Inventories/total shipments (1) | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** | *** |
| Production workers | 1,093 | 1,050 | 978 | 1,058 | 1,099 | 1,068 | 1,059 | -3.1 | -3.9 | -6.9 | 8.2 | 3.9 | -2.8 | -0.8 |
| Hours worked (1,000s) | 1,807 | 1,766 | 1,559 | 1,680 | 1,998 | 1,867 | 1,770 | -2.0 | -2.3 | -11.7 | 7.7 | 18.9 | -6.6 | -5.2 |
| Wages paid ($1,000s) | 28,178 | 27,048 | 25,256 | 29,610 | 34,092 | 34,009 | 32,999 | 17.1 | -4.0 | -6.6 | 17.2 | 15.1 | -0.2 | -3.0 |
| Hourly wages | $15.59 | $15.32 | $16.20 | $17.63 | $17.07 | $18.22 | $18.64 | 19.6 | -1.8 | 5.8 | 8.8 | -3.2 | 6.8 | 2.3 |
| Productivity (tons per hour) | 0.301 | 0.293 | 0.288 | 0.302 | 0.252 | 0.261 | 0.255 | -15.4 | -2.5 | -1.7 | 4.6 | -16.5 | 3.8 | -2.6 |
| Unit labor costs | $52 | $52 | $56 | $58 | $68 | $70 | $73 | 41.2 | 0.7 | 7.6 | 4.1 | 16.0 | 2.8 | 5.0 |
| Net sales: | | | | | | | | | | | | | | |
| Quantity | 499 | 477 | 421 | 467 | 509 | 490 | 457 | -8.4 | -4.5 | -11.7 | 11.0 | 9.0 | -3.8 | -6.6 |
| Value | 288,564 | 288,059 | 234,075 | 265,797 | 297,840 | 441,580 | 428,401 | 48.5 | -0.2 | -18.7 | 13.6 | 12.1 | 48.3 | -3.0 |
| Unit value | $578 | $604 | $556 | $569 | $585 | $901 | $936 | 62.0 | 4.6 | -7.9 | 2.3 | 2.8 | 54.0 | 3.9 |
| Cost of goods sold (COGS) | 226,206 | 233,531 | 188,135 | 210,432 | 252,677 | 337,733 | 356,747 | 57.7 | 3.2 | -19.4 | 11.9 | 20.1 | 33.7 | 5.6 |
| Gross profit or (loss) | 62,358 | 54,528 | 45,940 | 55,365 | 45,163 | 103,847 | 71,654 | 14.9 | -12.6 | -15.8 | 20.5 | -18.4 | 129.9 | -31.0 |
| SG&A expenses | 22,165 | 22,804 | 22,089 | 24,374 | 23,682 | 30,408 | 26,978 | 21.7 | 2.9 | -3.1 | 10.3 | -2.8 | 28.4 | -11.3 |
| Operating income or (loss) | 40,193 | 31,724 | 23,851 | 30,991 | 21,481 | 73,438 | 44,676 | 11.2 | -21.1 | -24.8 | 29.9 | -30.7 | 241.9 | -39.2 |
| Capital expenditures | 7,698 | 8,578 | 7,727 | 5,768 | 10,842 | 9,973 | 7,434 | -3.4 | 11.4 | -9.9 | -25.4 | 88.0 | -8.0 | -25.5 |
| Unit COGS | $453 | $490 | $447 | $451 | $496 | $689 | $780 | 72.1 | 8.1 | -8.7 | 0.8 | 10.1 | 38.9 | 13.1 |
| Unit SG&A expenses | $44 | $48 | $53 | $52 | $47 | $62 | $59 | 32.8 | 7.8 | 9.7 | -0.6 | -10.9 | 33.4 | -5.0 |
| Unit operating income or (loss) | $81 | $67 | $57 | $66 | $42 | $150 | $98 | 21.3 | -17.3 | -14.8 | 17.1 | -36.4 | 255.2 | -34.8 |
| COGS/sales (1) | 78.4 | 81.1 | 80.4 | 79.2 | 84.8 | 76.5 | 83.3 | 4.9 | 2.7 | -0.7 | -1.2 | 5.7 | -8.4 | 6.8 |
| Operating income or (loss)/ sales (1) | 13.9 | 11.0 | 10.2 | 11.7 | 7.2 | 16.6 | 10.4 | -3.5 | -2.9 | -0.8 | 1.5 | -4.4 | 9.4 | -6.2 |

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) 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 statistics of the U.S. Department of Commerce.

**Table C-1**
**Circular welded carbon steel pipes and tubes: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| Item | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. consumption quantity: | | | | | | |
| Amount | 2,812,359 | 2,996,472 | 2,304,619 | 2,191,218 | 6.5 | -4.9 |
| Producers' share (1) | 76.2 | 73.0 | 73.2 | 73.8 | -3.3 | 0.7 |
| Importers' share (1): | | | | | | |
| Brazil | (2) | (2) | (2) | (2) | 0.0 | 0.0 |
| India | 0.4 | 0.4 | 0.5 | 0.3 | 0.0 | -0.1 |
| Korea | 6.2 | 5.8 | 5.2 | 5.9 | -0.3 | 0.7 |
| Mexico | 0.1 | 0.5 | 0.5 | 0.9 | 0.4 | 0.4 |
| Taiwan | 0.8 | 1.4 | 1.5 | 1.4 | 0.5 | -0.1 |
| Thailand | 2.2 | 0.9 | 1.2 | 1.6 | -1.3 | 0.4 |
| Turkey | 0.1 | 0.2 | 0.1 | 0.6 | 0.2 | 0.5 |
| Venezuela | (2) | 0.1 | 0.1 | 0.0 | 0.1 | -0.1 |
| Subtotal | 9.8 | 9.5 | 9.2 | 10.8 | -0.3 | 1.6 |
| Other sources (3) | 14.0 | 17.6 | 17.6 | 15.4 | 3.6 | -2.2 |
| Total imports | 23.8 | 27.0 | 26.8 | 26.2 | 3.3 | -0.7 |
| U.S. consumption value: | | | | | | |
| Amount | 1,678,432 | 1,727,424 | 1,344,256 | 1,193,290 | 2.9 | -11.2 |
| Producers' share (1) | 77.9 | 75.0 | 75.2 | 76.2 | -2.9 | 1.0 |
| Importers' share (1): | | | | | | |
| Brazil | (2) | (2) | (2) | (2) | 0.0 | 0.0 |
| India | 0.3 | 0.4 | 0.4 | 0.3 | 0.0 | -0.2 |
| Korea | 4.8 | 4.6 | 4.2 | 4.4 | -0.2 | 0.2 |
| Mexico | 0.1 | 0.5 | 0.5 | 0.8 | 0.4 | 0.3 |
| Taiwan | 0.6 | 1.1 | 1.1 | 1.0 | 0.4 | -0.2 |
| Thailand | 1.8 | 0.8 | 1.0 | 1.2 | -1.0 | 0.2 |
| Turkey | 0.1 | 0.2 | 0.1 | 0.4 | 0.1 | 0.3 |
| Venezuela | (2) | 0.1 | 0.1 | 0.0 | 0.1 | -0.1 |
| Subtotal | 7.8 | 7.6 | 7.5 | 8.1 | -0.2 | 0.6 |
| Other sources (3) | 14.3 | 17.3 | 17.3 | 15.7 | 3.1 | -1.6 |
| Total imports | 22.1 | 25.0 | 24.8 | 23.8 | 2.9 | -1.0 |
| U.S. imports from: | | | | | | |
| Brazil: | | | | | | |
| Quantity | 69 | 45 | 38 | 45 | -33.8 | 19.1 |
| Value | 139 | 82 | 70 | 72 | -41.1 | 3.0 |
| Unit value | $2,031.95 | $1,808.18 | $1,844.43 | $1,595.27 | -11.0 | -13.5 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| India: | | | | | | |
| Quantity | 10,095 | 12,137 | 11,190 | 7,429 | 20.2 | -33.6 |
| Value | 5,367 | 6,211 | 5,686 | 3,097 | 15.7 | -45.5 |
| Unit value | $531.63 | $511.71 | $508.09 | $416.87 | -3.7 | -18.0 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Korea: | | | | | | |
| Quantity | 173,579 | 174,929 | 120,983 | 129,806 | 0.8 | 7.3 |
| Value | 80,284 | 79,702 | 56,583 | 52,656 | -0.7 | -6.9 |
| Unit value | $462.52 | $455.62 | $467.69 | $405.65 | -1.5 | -13.3 |
| Ending inventory quantity | 0 | 0 | 0 | 1,011 | 0.0 | (4) |
| Mexico: | | | | | | |
| Quantity | 3,407 | 16,282 | 12,501 | 19,875 | 377.9 | 59.0 |
| Value | 1,957 | 8,262 | 6,360 | 9,712 | 322.1 | 52.7 |
| Unit value | $574.44 | $507.41 | $508.73 | $488.64 | -11.7 | -4.0 |
| Ending inventory quantity | 0 | 422 | 394 | 96 | (4) | -75.6 |
| Taiwan: | | | | | | |
| Quantity | 23,027 | 41,007 | 33,980 | 30,792 | 78.1 | -9.4 |
| Value | 10,861 | 18,144 | 15,306 | 11,353 | 67.0 | -25.8 |
| Unit value | $471.69 | $442.45 | $450.44 | $368.68 | -6.2 | -18.2 |
| Ending inventory quantity | 1,620 | 583 | 632 | 393 | -64.0 | -37.8 |
| Thailand: | | | | | | |
| Quantity | 62,328 | 28,049 | 28,049 | 35,251 | -55.0 | 25.7 |
| Value | 30,740 | 13,996 | 13,996 | 14,898 | -54.5 | 6.4 |
| Unit value | $493.20 | $499.00 | $499.00 | $422.63 | 1.2 | -15.3 |
| Ending inventory quantity | 3,189 | 1,996 | 477 | 1,924 | -37.4 | 303.4 |
| Turkey: | | | | | | |
| Quantity | 2,674 | 7,396 | 2,469 | 12,970 | 176.6 | 425.3 |
| Value | 1,225 | 3,334 | 1,163 | 4,920 | 172.0 | 323.2 |
| Unit value | $458.32 | $450.70 | $470.81 | $379.28 | -1.7 | -19.4 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |

Table continued on next page.

**Table C-1--Continued**
**Circular welded carbon steel pipes and tubes: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| Item | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. imports from: | | | | | | |
| Venezuela: | | | | | | |
| Quantity | 110 | 3,327 | 3,327 | 0 | 2,924.2 | -100.0 |
| Value | 66 | 1,660 | 1,660 | 0 | 2,407.0 | -100.0 |
| Unit value | $601.98 | $499.03 | $499.03 | (4) | -17.1 | (4) |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Subtotal: | | | | | | |
| Quantity | 275,288 | 283,174 | 212,537 | 236,170 | 2.9 | 11.1 |
| Value | 130,641 | 131,391 | 100,824 | 96,707 | 0.6 | -4.1 |
| Unit value | $474.56 | $463.99 | $474.38 | $409.48 | -2.2 | -13.7 |
| Ending inventory quantity | 4,809 | 3,001 | 1,503 | 3,424 | -37.6 | 127.8 |
| Other sources (3): | | | | | | |
| Quantity | 393,202 | 526,937 | 405,855 | 337,316 | 34.0 | -16.9 |
| Value | 239,456 | 299,612 | 232,489 | 187,489 | 25.1 | -19.4 |
| Unit value | $608.99 | $568.59 | $572.84 | $555.83 | -6.6 | -3.0 |
| Ending inventory quantity | 490 | 1,052 | 6,371 | 1,850 | 114.7 | -71.0 |
| All sources: | | | | | | |
| Quantity | 668,490 | 810,111 | 618,392 | 573,486 | 21.2 | -7.3 |
| Value | 370,097 | 431,002 | 333,313 | 284,196 | 16.5 | -14.7 |
| Unit value | $553.63 | $532.03 | $539.00 | $495.56 | -3.9 | -8.1 |
| Ending inventory quantity | 5,299 | 4,053 | 7,874 | 5,274 | -23.5 | -33.0 |
| U.S. producers': | | | | | | |
| Average capacity quantity | 2,960,690 | 3,039,075 | 2,286,578 | 2,297,082 | 2.6 | 0.5 |
| Production quantity | 2,256,226 | 2,226,684 | 1,705,991 | 1,604,410 | -1.3 | -6.0 |
| Capacity utilization (1) | 76.2 | 73.3 | 74.6 | 69.8 | -2.9 | -4.8 |
| U.S. shipments: | | | | | | |
| Quantity | 2,143,869 | 2,186,361 | 1,686,227 | 1,617,732 | 2.0 | -4.1 |
| Value | 1,308,335 | 1,296,421 | 1,010,943 | 909,094 | -0.9 | -10.1 |
| Unit value | $610.27 | $592.96 | $599.53 | $561.96 | -2.8 | -6.3 |
| Export shipments: | | | | | | |
| Quantity | 102,827 | 48,401 | 37,960 | 36,819 | -52.9 | -3.0 |
| Value | 57,243 | 28,862 | 22,173 | 19,802 | -49.6 | -10.7 |
| Unit value | $556.69 | $596.32 | $584.12 | $537.83 | 7.1 | -7.9 |
| Ending inventory quantity | 272,395 | 270,889 | 259,005 | 245,331 | -0.6 | -5.3 |
| Inventories/total shipments (1) | 12.1 | 12.1 | 11.3 | 11.1 | -0.0 | -0.1 |
| Production workers | 2,869 | 2,996 | 2,862 | 2,850 | 4.4 | -0.4 |
| Hours worked (1,000s) | 6,132 | 6,160 | 4,648 | 4,651 | 0.5 | 0.1 |
| Wages paid ($1,000s) | 100,442 | 102,421 | 76,564 | 78,537 | 2.0 | 2.6 |
| Hourly wages | $15.44 | $15.79 | $15.64 | $15.97 | 2.3 | 2.1 |
| Productivity (tons/1,000 hours) | 321.3 | 324.0 | 325.6 | 317.8 | 0.8 | -2.4 |
| Unit labor costs | $49.17 | $49.57 | $48.89 | $51.14 | 0.8 | 4.6 |
| Net sales: | | | | | | |
| Quantity | 2,125,717 | 2,139,655 | 1,668,872 | 1,583,653 | 0.7 | -5.1 |
| Value | 1,309,986 | 1,301,467 | 1,017,477 | 907,007 | -0.7 | -10.9 |
| Unit value | $616.26 | $608.26 | $609.68 | $572.73 | -1.3 | -6.1 |
| Cost of goods sold (COGS) | 1,112,093 | 1,106,748 | 864,290 | 768,242 | -0.5 | -11.1 |
| Gross profit or (loss) | 197,894 | 194,719 | 153,187 | 138,765 | -1.6 | -9.4 |
| SG&A expenses | 69,983 | 77,188 | 59,140 | 61,612 | 10.3 | 4.2 |
| Operating income or (loss) | 127,910 | 117,531 | 94,048 | 77,152 | -8.1 | -18.0 |
| Capital expenditures | 25,039 | 32,814 | 23,511 | 26,066 | 31.1 | 10.9 |
| Unit COGS | $523.16 | $517.26 | $517.89 | $485.11 | -1.1 | -6.3 |
| Unit SG&A expenses | $32.92 | $36.08 | $35.44 | $38.91 | 9.6 | 9.8 |
| Unit operating income or (loss) | $60.17 | $54.93 | $56.35 | $48.72 | -8.7 | -13.6 |
| COGS/sales (1) | 84.9 | 85.0 | 84.9 | 84.7 | 0.1 | -0.2 |
| Operating income or (loss)/ sales (1) | 9.8 | 9.0 | 9.2 | 8.5 | -0.7 | -0.7 |

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Less than 0.05 percent.
(3) Estimated by the staff to remove mechanical pipe and tubing included in official Commerce statistics.
(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. January-September inventory ratios are annualized.

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

**Table C-2**
**Certain small diameter circular welded carbon steel pipes and tubes: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| Item | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. consumption quantity: | | | | | | |
| Amount | 1,625,326 | 1,749,775 | 1,343,716 | 1,303,382 | 7.7 | -3.0 |
| Producers' share (1) | 70.4 | 64.7 | 65.4 | 64.8 | -5.7 | -0.6 |
| Importers' share (1): | | | | | | |
| Taiwan | 1.4 | 2.3 | 2.5 | 2.2 | 0.9 | -0.3 |
| Other sources | 28.2 | 33.0 | 32.1 | 33.1 | 4.7 | 0.9 |
| Total imports | 29.6 | 35.3 | 34.6 | 35.2 | 5.7 | 0.6 |
| U.S. consumption value: | | | | | | |
| Amount | 975,467 | 999,160 | 773,683 | 698,415 | 2.4 | -9.7 |
| Producers' share (1) | 74.3 | 68.4 | 68.9 | 69.3 | -5.9 | 0.4 |
| Importers' share (1): | | | | | | |
| Taiwan | 1.1 | 1.8 | 2.0 | 1.5 | 0.7 | -0.4 |
| Other sources | 24.6 | 29.8 | 29.2 | 29.2 | 5.2 | 0.0 |
| Total imports | 25.7 | 31.6 | 31.1 | 30.7 | 5.9 | -0.4 |
| U.S. imports from: | | | | | | |
| Taiwan: | | | | | | |
| Quantity | 23,015 | 40,945 | 33,980 | 28,648 | 77.9 | -15.7 |
| Value | 10,855 | 18,120 | 15,306 | 10,678 | 66.9 | -30.2 |
| Unit value | $471.66 | $442.54 | $450.44 | $372.73 | -6.2 | -17.3 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Other sources: | | | | | | |
| Quantity | 458,728 | 576,778 | 431,487 | 430,774 | 25.7 | -0.2 |
| Value | 240,203 | 297,618 | 225,556 | 203,904 | 23.9 | -9.6 |
| Unit value | $523.63 | $516.00 | $522.74 | $473.34 | -1.5 | -9.4 |
| Ending inventory quantity | 2,780 | 1,889 | 542 | 2,779 | -32.1 | 412.7 |
| All sources: | | | | | | |
| Quantity | 481,743 | 617,723 | 465,467 | 459,422 | 28.2 | -1.3 |
| Value | 251,058 | 315,738 | 240,861 | 214,582 | 25.8 | -10.9 |
| Unit value | $521.15 | $511.13 | $517.46 | $467.07 | -1.9 | -9.7 |
| Ending inventory quantity | 2,780 | 1,889 | 542 | 2,779 | -32.1 | 412.7 |
| U.S. producers': | | | | | | |
| Average capacity quantity | 1,658,197 | 1,669,390 | 1,244,668 | 1,241,968 | 0.7 | -0.2 |
| Production quantity | 1,170,933 | 1,148,789 | 888,901 | 849,091 | -1.9 | -4.5 |
| Capacity utilization (1) | 70.3 | 68.5 | 71.1 | 67.9 | -1.8 | -3.1 |
| U.S. shipments: | | | | | | |
| Quantity | 1,143,583 | 1,132,052 | 878,249 | 843,960 | -1.0 | -3.9 |
| Value | 724,409 | 683,422 | 532,821 | 483,834 | -5.7 | -9.2 |
| Unit value | $633.46 | $603.70 | $606.69 | $573.29 | -4.7 | -5.5 |
| Export shipments: | | | | | | |
| Quantity | 40,702 | 32,511 | 25,743 | 27,986 | -20.1 | 8.7 |
| Value | 25,232 | 20,346 | 15,445 | 15,565 | -19.4 | 0.8 |
| Unit value | $619.91 | $625.83 | $599.98 | $556.18 | 1.0 | -7.3 |
| Ending inventory quantity | 149,895 | 140,928 | 139,781 | 143,076 | -6.0 | 2.4 |
| Inventories/total shipments (1) | 12.7 | 12.1 | 11.6 | 12.3 | -0.6 | 0.7 |
| Production workers | 1,985 | 1,983 | 1,880 | 1,859 | -0.1 | -1.1 |
| Hours worked (1,000s) | 3,985 | 3,739 | 2,827 | 2,768 | -6.2 | -2.1 |
| Wages paid ($1,000s) | 67,389 | 65,809 | 49,131 | 49,634 | -2.3 | 1.0 |
| Hourly wages | $15.46 | $16.22 | $16.01 | $16.39 | 4.9 | 2.4 |
| Productivity (tons/1,000 hours) | 275.7 | 288.4 | 296.0 | 285.8 | 4.6 | -3.4 |
| Unit labor costs | $57.55 | $57.29 | $55.27 | $58.46 | -0.5 | 5.8 |
| Net sales: | | | | | | |
| Quantity | 1,073,628 | 1,069,558 | 824,834 | 813,310 | -0.4 | -1.4 |
| Value | 692,683 | 662,546 | 515,210 | 481,178 | -4.4 | -6.6 |
| Unit value | $645.18 | $619.46 | $624.62 | $591.63 | -4.0 | -5.3 |
| Cost of goods sold (COGS) | 613,227 | 586,837 | 456,314 | 417,690 | -4.3 | -8.5 |
| Gross profit or (loss) | 79,456 | 75,709 | 58,896 | 63,488 | -4.7 | 7.8 |
| SG&A expenses | 41,958 | 43,175 | 33,893 | 34,533 | 2.9 | 1.9 |
| Operating income or (loss) | 37,498 | 32,534 | 25,003 | 28,955 | -13.2 | 15.8 |
| Capital expenditures | 7,797 | 7,745 | 5,230 | 6,816 | -0.7 | 30.3 |
| Unit COGS | $571.17 | $548.67 | $553.22 | $513.57 | -3.9 | -7.2 |
| Unit SG&A expenses | $39.08 | $40.37 | $41.09 | $42.46 | 3.3 | 3.3 |
| Unit operating income or (loss) | $34.93 | $30.42 | $30.31 | $35.60 | -12.9 | 17.4 |
| COGS/sales (1) | 88.5 | 88.6 | 88.6 | 86.8 | 0.0 | -1.8 |
| Operating income or (loss)/ sales (1) | 5.4 | 4.9 | 4.9 | 6.0 | -0.5 | 1.2 |

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

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. January-September inventory ratios are annualized.

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

**Table C-3**
**Light-walled rectangular carbon steel pipes and tubes: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| Item | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. consumption quantity: | | | | | | |
| Amount | 525,598 | 564,898 | 427,891 | 492,192 | 7.5 | 15.0 |
| Producers' share (1) | 72.2 | 71.7 | 72.4 | 66.9 | -0.5 | -5.5 |
| Importers' share (1): | | | | | | |
| Argentina | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Singapore | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Taiwan | 0.0 | (2) | (2) | (2) | 0.0 | 0.0 |
| Subtotal | 0.0 | (2) | (2) | (2) | 0.0 | 0.0 |
| Other sources | 27.8 | 28.3 | 27.6 | 33.1 | 0.5 | 5.5 |
| Total imports | 27.8 | 28.3 | 27.6 | 33.1 | 0.5 | 5.5 |
| U.S. consumption value: | | | | | | |
| Amount | 294,483 | 304,292 | 233,228 | 245,151 | 3.3 | 5.1 |
| Producers' share (1) | 75.1 | 74.3 | 74.8 | 70.0 | -0.8 | -4.7 |
| Importers' share (1): | | | | | | |
| Argentina | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Singapore | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 |
| Taiwan | 0.0 | (2) | (2) | (2) | 0.0 | 0.0 |
| Subtotal | 0.0 | (2) | (2) | (2) | 0.0 | 0.0 |
| Other sources | 24.9 | 25.7 | 25.2 | 29.9 | 0.8 | 4.7 |
| Total imports | 24.9 | 25.7 | 25.2 | 30.0 | 0.8 | 4.7 |
| U.S. imports from: | | | | | | |
| Argentina: | | | | | | |
| Quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Value | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Unit value | (3) | (3) | (3) | (3) | (3) | (3) |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Singapore: | | | | | | |
| Quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Value | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Unit value | (3) | (3) | (3) | (3) | (3) | (3) |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Taiwan: | | | | | | |
| Quantity | 0 | 47 | 31 | 38 | (3) | 22.1 |
| Value | 0 | 86 | 57 | 63 | (3) | 11.8 |
| Unit value | (3) | $1,819.40 | $1,842.88 | $1,686.80 | (3) | -8.5 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Subtotal: | | | | | | |
| Quantity | 0 | 47 | 31 | 38 | (3) | 22.1 |
| Value | 0 | 86 | 57 | 63 | (3) | 11.8 |
| Unit value | (3) | $1,819.40 | $1,842.88 | $1,686.80 | (3) | -8.5 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Other sources: | | | | | | |
| Quantity | 146,220 | 159,881 | 118,237 | 162,859 | 9.3 | 37.7 |
| Value | 73,459 | 78,263 | 58,815 | 73,409 | 6.5 | 24.8 |
| Unit value | $502.38 | $489.51 | $497.43 | $450.75 | -2.6 | -9.4 |
| Ending inventory quantity | 300 | 444 | 1,641 | 1,109 | 48.0 | -32.4 |
| All sources: | | | | | | |
| Quantity | 146,220 | 159,928 | 118,268 | 162,897 | 9.4 | 37.7 |
| Value | 73,459 | 78,349 | 58,872 | 73,473 | 6.7 | 24.8 |
| Unit value | $502.38 | $489.90 | $497.78 | $451.04 | -2.5 | -9.4 |
| Ending inventory quantity | 300 | 444 | 1,641 | 1,109 | 48.0 | -32.4 |

Table continued on next page.

**Table C-3--Continued**
**Light-walled rectangular carbon steel pipes and tubes: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| Item | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. producers': | | | | | | |
| Average capacity quantity | 567,640 | 599,170 | 447,584 | 494,793 | 5.6 | 10.5 |
| Production quantity | 382,215 | 403,669 | 310,626 | 335,015 | 5.6 | 7.9 |
| Capacity utilization (1) | 67.3 | 67.4 | 69.4 | 67.7 | 0.0 | -1.7 |
| U.S. shipments: | | | | | | |
| Quantity | 379,378 | 404,970 | 309,623 | 329,295 | 6.7 | 6.4 |
| Value | 221,025 | 225,943 | 174,356 | 171,678 | 2.2 | -1.5 |
| Unit value | $582.60 | $557.93 | $563.12 | $521.35 | -4.2 | -7.4 |
| Export shipments: | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 42,960 | 42,295 | 44,653 | 47,908 | -1.5 | 7.3 |
| Inventories/total shipments (1) | *** | *** | *** | *** | *** | *** |
| Production workers | 528 | 549 | 553 | 590 | 4.0 | 6.7 |
| Hours worked (1,000s) | 1,166 | 1,197 | 1,015 | 1,091 | 2.6 | 7.5 |
| Wages paid ($1,000s) | 14,729 | 15,530 | 12,854 | 14,275 | 5.4 | 11.1 |
| Hourly wages | $12.63 | $12.98 | $12.66 | $13.08 | 2.7 | 3.3 |
| Productivity (tons/1,000 hours) | 327.8 | 337.3 | 306.0 | 306.9 | 2.9 | 0.3 |
| Unit labor costs | $38.54 | $38.47 | $41.38 | $42.61 | -0.2 | 3.0 |
| Net sales: | | | | | | |
| Quantity | 187,993 | 183,392 | 143,617 | 145,252 | -2.4 | 1.1 |
| Value | 116,251 | 112,005 | 88,643 | 82,849 | -3.7 | -6.5 |
| Unit value | $618.38 | $610.74 | $617.22 | $570.38 | -1.2 | -7.6 |
| Cost of goods sold (COGS) | 97,201 | 93,860 | 73,905 | 67,768 | -3.4 | -8.3 |
| Gross profit or (loss) | 19,050 | 18,146 | 14,738 | 15,081 | -4.7 | 2.3 |
| SG&A expenses | 8,151 | 7,660 | 6,118 | 6,282 | -6.0 | 2.7 |
| Operating income or (loss) | 10,899 | 10,485 | 8,620 | 8,800 | -3.8 | 2.1 |
| Capital expenditures | 3,897 | 3,088 | 2,166 | *** | -20.8 | *** |
| Unit COGS | $517.05 | $511.80 | $514.60 | $466.56 | -1.0 | -9.3 |
| Unit SG&A expenses | $43.36 | $41.77 | $42.60 | $43.25 | -3.7 | 1.5 |
| Unit operating income or (loss) | $57.98 | $57.17 | $60.02 | $60.58 | -1.4 | 0.9 |
| COGS/sales (1) | 83.6 | 83.8 | 83.4 | 81.8 | 0.2 | -1.6 |
| Operating income or (loss)/ sales (1) | 9.4 | 9.4 | 9.7 | 10.6 | -0.0 | 0.9 |

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Less than 0.05 percent.
(3) 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. January-September inventory ratios are annualized.

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

**Table C-4**
**OCTG other than drill pipe: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| Item | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. consumption quantity: | | | | | | |
| Amount | 2,464,896 | 1,649,796 | 1,378,309 | 759,717 | -33.1 | -44.9 |
| Producers' share (1) | 83.8 | 79.4 | 79.0 | 87.5 | -4.4 | 8.5 |
| Importers' share (1): | | | | | | |
| Canada | *** | *** | *** | *** | *** | *** |
| Taiwan | (2) | (2) | (2) | (2) | 0.0 | 0.0 |
| Subtotal | *** | *** | *** | *** | *** | *** |
| Other sources | *** | *** | *** | *** | *** | *** |
| Total imports | 16.2 | 20.6 | 21.0 | 12.5 | 4.4 | -8.5 |
| U.S. consumption value: | | | | | | |
| Amount | 1,766,882 | 1,197,408 | 992,761 | 447,801 | -32.2 | -54.9 |
| Producers' share (1) | 82.9 | 78.2 | 78.0 | 82.9 | -4.7 | 5.0 |
| Importers' share (1): | | | | | | |
| Canada | *** | *** | *** | *** | *** | *** |
| Taiwan | (2) | (2) | (2) | (2) | 0.0 | 0.0 |
| Subtotal | *** | *** | *** | *** | *** | *** |
| Other sources | *** | *** | *** | *** | *** | *** |
| Total imports | 17.1 | 21.8 | 22.0 | 17.1 | 4.7 | -5.0 |
| U.S. imports from: | | | | | | |
| Canada: | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Taiwan: | | | | | | |
| Quantity | 3 | 5 | 2 | 43 | 68.0 | 1,633.4 |
| Value | 19 | 12 | 6 | 66 | -39.1 | 978.3 |
| Unit value | $6,608.22 | $2,396.18 | $2,442.94 | $1,519.66 | -63.7 | -37.8 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Subtotal: | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Other sources: | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 660 | 2,171 | 1,446 | 1,638 | 228.7 | 13.3 |
| All sources: | | | | | | |
| Quantity | 398,258 | 339,463 | 288,987 | 95,021 | -14.8 | -67.1 |
| Value | 302,033 | 261,486 | 218,809 | 76,396 | -13.4 | -65.1 |
| Unit value | $758.38 | $770.29 | $757.16 | $803.99 | 1.6 | 6.2 |
| Ending inventory quantity | 660 | 2,171 | 1,446 | 1,638 | 228.7 | 13.3 |

Table continued on next page.

**Table C-4--Continued**
**OCTG other than drill pipe: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| Item | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. producers': | | | | | | |
| Average capacity quantity | 2,597,546 | 2,594,663 | 1,937,483 | 1,888,940 | -0.1 | -2.5 |
| Production quantity | 2,320,660 | 1,435,248 | 1,210,240 | 690,882 | -38.2 | -42.9 |
| Capacity utilization (1) | 89.3 | 55.3 | 62.5 | 36.6 | -34.0 | -25.9 |
| U.S. shipments: | | | | | | |
| Quantity | 2,066,638 | 1,310,333 | 1,089,322 | 664,696 | -36.6 | -39.0 |
| Value | 1,464,849 | 935,922 | 773,952 | 371,405 | -36.1 | -52.0 |
| Unit value | $708.81 | $714.26 | $710.49 | $558.76 | 0.8 | -21.4 |
| Export shipments: | | | | | | |
| Quantity | 192,259 | 148,594 | 113,312 | 47,419 | -22.7 | -58.2 |
| Value | 136,204 | 106,212 | 81,295 | 28,057 | -22.0 | -65.5 |
| Unit value | $708.44 | $714.78 | $717.44 | $591.68 | 0.9 | -17.5 |
| Ending inventory quantity | 188,443 | 164,764 | 202,052 | 133,570 | -12.6 | -33.9 |
| Inventories/total shipments (1) | 8.3 | 11.3 | 12.6 | 14.1 | 3.0 | 1.5 |
| Production workers | 3,835 | 3,182 | 3,190 | 2,204 | -17.0 | -30.9 |
| Hours worked (1,000s) | 8,319 | 5,907 | 4,818 | 3,028 | -29.0 | -37.2 |
| Wages paid ($1,000s) | 150,896 | 100,965 | 84,808 | 52,884 | -33.1 | -37.6 |
| Hourly wages | $18.14 | $17.09 | $17.60 | $17.47 | -5.8 | -0.8 |
| Productivity (tons/1,000 hours) | 279.0 | 243.0 | 251.2 | 228.2 | -12.9 | -9.1 |
| Unit labor costs | $65.02 | $70.35 | $70.08 | $76.55 | 8.2 | 9.2 |
| Net sales: | | | | | | |
| Quantity | 2,263,366 | 1,466,529 | *** | *** | -35.2 | *** |
| Value | 1,609,876 | 1,054,600 | *** | *** | -34.5 | *** |
| Unit value | $711.28 | $719.11 | *** | *** | 1.1 | *** |
| Cost of goods sold (COGS) | 1,413,196 | 983,251 | *** | *** | -30.4 | *** |
| Gross profit or (loss) | 196,680 | 71,349 | 75,175 | (53,537) | -63.7 | (3) |
| SG&A expenses | 69,715 | 60,339 | 47,344 | 32,854 | -13.4 | -30.6 |
| Operating income or (loss) | 126,965 | 11,010 | 27,831 | (86,391) | -91.3 | (3) |
| Capital expenditures | 37,433 | 73,090 | 52,814 | 42,966 | 95.3 | -18.6 |
| Unit COGS | $624.38 | $670.46 | *** | *** | 7.4 | *** |
| Unit SG&A expenses | $30.80 | $41.14 | *** | *** | 33.6 | *** |
| Unit operating income or (loss) | $56.10 | $7.51 | *** | *** | -86.6 | *** |
| COGS/sales (1) | 87.8 | 93.2 | *** | *** | 5.5 | *** |
| Operating income or (loss)/ sales (1) | 7.9 | 1.0 | *** | *** | -6.8 | *** |

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Less than 0.05 percent.
(3) Undefined.

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. January-September inventory ratios are annualized.

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

**Table C-5**
**Drill pipe: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| Item | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. consumption quantity: | | | | | | |
| Amount | *** | *** | *** | *** | *** | *** |
| Producers' share (1) | *** | *** | *** | *** | *** | *** |
| Importers' share (1): | | | | | | |
| Canada | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** |
| Subtotal | *** | *** | *** | *** | *** | *** |
| Other sources | *** | *** | *** | *** | *** | *** |
| Total imports | *** | *** | *** | *** | *** | *** |
| U.S. consumption value: | | | | | | |
| Amount | *** | *** | *** | *** | *** | *** |
| Producers' share (1) | *** | *** | *** | *** | *** | *** |
| Importers' share (1): | | | | | | |
| Canada | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** |
| Subtotal | *** | *** | *** | *** | *** | *** |
| Other sources | *** | *** | *** | *** | *** | *** |
| Total imports | *** | *** | *** | *** | *** | *** |
| U.S. imports from: | | | | | | |
| Canada: | | | | | | |
| Quantity | 1,786 | 323 | 277 | 96 | -81.9 | -65.4 |
| Value | 4,821 | 840 | 569 | 394 | -82.6 | -30.6 |
| Unit value | $2,699.99 | $2,601.83 | $2,055.03 | $4,120.61 | -3.6 | 100.5 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Taiwan: | | | | | | |
| Quantity | 0 | 1 | 1 | 21 | (3) | 2,911.8 |
| Value | 0 | 2 | 2 | 25 | (3) | 1,360.4 |
| Unit value | (3) | $2,513.13 | $2,513.13 | $1,218.59 | (3) | -51.5 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Subtotal: | | | | | | |
| Quantity | 1,786 | 324 | 277 | 116 | -81.9 | -58.1 |
| Value | 4,821 | 842 | 570 | 419 | -82.5 | -26.4 |
| Unit value | $2,699.99 | $2,601.64 | $2,056.15 | $3,608.41 | -3.6 | 75.5 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Other sources: | | | | | | |
| Quantity | 11,777 | 7,836 | 7,274 | 2,499 | -33.5 | -65.6 |
| Value | 9,410 | 13,952 | 12,483 | 2,845 | 48.3 | -77.2 |
| Unit value | $798.97 | $1,780.43 | $1,716.22 | $1,138.60 | 122.8 | -33.7 |
| Ending inventory quantity | 4,033 | 3,041 | 3,930 | 2,397 | -24.6 | -39.0 |
| All sources: | | | | | | |
| Quantity | 13,563 | 8,160 | 7,551 | 2,615 | -39.8 | -65.4 |
| Value | 14,231 | 14,794 | 13,054 | 3,265 | 4.0 | -75.0 |
| Unit value | $1,049.24 | $1,812.99 | $1,728.70 | $1,248.39 | 72.8 | -27.8 |
| Ending inventory quantity | 4,033 | 3,041 | 3,930 | 2,397 | -24.6 | -39.0 |

Table continued on next page.

**Table C-5--Continued**
**Drill pipe: Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| Item | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. producers': | | | | | | |
| 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 (tons/1,000 hours) | *** | *** | *** | *** | *** | *** |
| 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) | *** | *** | *** | *** | *** | *** |

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Less than 0.05 percent.
(3) Not applicable.
(4) Undefined.

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. January-September inventory ratios are annualized.

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

**Table C-6**
**OCTG (including drill pipe): Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| Item | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. consumption quantity: | | | | | | |
| Amount | *** | *** | *** | *** | *** | *** |
| Producers' share (1) | *** | *** | *** | *** | *** | *** |
| Importers' share (1): | | | | | | |
| Canada | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** |
| Subtotal | *** | *** | *** | *** | *** | *** |
| Other sources | *** | *** | *** | *** | *** | *** |
| Total imports | *** | *** | *** | *** | *** | *** |
| U.S. consumption value: | | | | | | |
| Amount | *** | *** | *** | *** | *** | *** |
| Producers' share (1) | *** | *** | *** | *** | *** | *** |
| Importers' share (1): | | | | | | |
| Canada | *** | *** | *** | *** | *** | *** |
| Taiwan | *** | *** | *** | *** | *** | *** |
| Subtotal | *** | *** | *** | *** | *** | *** |
| Other sources | *** | *** | *** | *** | *** | *** |
| Total imports | *** | *** | *** | *** | *** | *** |
| U.S. imports from: | | | | | | |
| Canada: | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Taiwan: | | | | | | |
| Quantity | 3 | 6 | 3 | 64 | 91.6 | 1,907.4 |
| Value | 19 | 13 | 8 | 91 | -30.1 | 1,062.0 |
| Unit value | $6,608.22 | $2,410.61 | $2,457.98 | $1,422.86 | -63.5 | -42.1 |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Subtotal: | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 0 | 0 | 0 | 0 | 0.0 | 0.0 |
| Other sources: | | | | | | |
| Quantity | *** | *** | *** | *** | *** | *** |
| Value | *** | *** | *** | *** | *** | *** |
| Unit value | *** | *** | *** | *** | *** | *** |
| Ending inventory quantity | 4,693 | 5,212 | 5,376 | 4,035 | 11.0 | -24.9 |
| All sources: | | | | | | |
| Quantity | 411,821 | 347,623 | 296,538 | 97,636 | -15.6 | -67.1 |
| Value | 316,264 | 276,280 | 231,862 | 79,661 | -12.6 | -65.6 |
| Unit value | $767.96 | $794.77 | $781.90 | $815.89 | 3.5 | 4.3 |
| Ending inventory quantity | 4,693 | 5,212 | 5,376 | 4,035 | 11.0 | -24.9 |

Table continued on next page.

**Table C-6--Continued**
**OCTG (including drill pipe): Summary data concerning the U.S. market, 1997-98, January-September 1998, and January-September 1999**

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

| | Reported data | | | | Period changes | |
|---|---|---|---|---|---|---|
| | | | January-September | | | Jan.-Sept. |
| Item | 1997 | 1998 | 1998 | 1999 | 1997-98 | 1998-99 |
| U.S. producers': | | | | | | |
| 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 (tons/1,000 hours) | *** | *** | *** | *** | *** | *** |
| 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) | *** | *** | *** | *** | *** | *** |

(1) "Reported data" are in percent and "period changes" are in percentage points.
(2) Less than 0.05 percent.
(3) Undefined.

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. January-September inventory ratios are annualized.

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. A response was received from domestic interested parties and it named the following six firms as the top purchasers of circular welded pipe: ***. Purchaser questionnaires were sent to these six firms and one firm (***) provided responses which are presented below.

1. a.) Have any changes occurred in technology; production methods; or development efforts to produce circular welded pipe that affected the availability of circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey since 2011?

   b.) Do you anticipate any changes in technology; production methods; or development efforts to produce circular welded pipe that will affect the availability of circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey within a reasonably foreseeable time?

| Purchaser | Changes that have occurred | Anticipated changes |
|---|---|---|
| *** | No | No |

2. a.) Have any changes occurred in the ability to increase production of circular welded pipe (including the shift of production facilities used for other products and the use, cost, or availability of major inputs into production) that affected the availability of circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey since 2011?

   b.) Do you anticipate any changes in the ability to increase production (including the shift of production facilities used for other products and the use, cost, or availability of major inputs into production) that will affect the availability of circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey within a reasonably foreseeable time?

| Purchaser | Changes that have occurred | Anticipated changes |
|---|---|---|
| *** | No | No |

3. a.) Have any changes occurred in factors related to the ability to shift supply of circular welded pipe among different national markets (including barriers to importation in foreign markets or changes in market demand abroad) that affected the availability of circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey since 2011?

   b.) Do you anticipate any changes in factors related to the ability to shift supply among different national markets (including barriers to importation in foreign markets or changes in market

demand abroad) that will affect the availability of circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey within a reasonably foreseeable time?

| Purchaser | Changes that have occurred | Anticipated changes |
|---|---|---|
| *** | No | No |

4. a.) Have there been any changes in the end uses and applications of circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey since 2011?

   b.) Do you anticipate any changes in the end uses and applications of circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey within a reasonably foreseeable time?

| Purchaser | Changes that have occurred | Anticipated changes |
|---|---|---|
| *** | More products such as plastic, pex (sic) and corrugated flex hose. | More acceptability of above referenced products. |

5. a.) Have there been any changes in the existence and availability of substitute products for circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey since 2011?

   b.) Do you anticipate any changes in the existence and availability of substitute products for circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey within a reasonably foreseeable time?

| Purchaser | Changes that have occurred | Anticipated changes |
|---|---|---|
| *** | The above reference products continually are upgraded and used in new applications. | No. |

6. a.) Have there been any changes in the level of competition between circular welded pipe produced in the United States, circular welded pipe produced in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey, and such merchandise from other countries in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey since 2011?

   b.) Do you anticipate any changes in the level of competition between circular welded pipe produced in the United States, circular welded pipe produced in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey, and such merchandise from other countries in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey within a reasonably foreseeable time?

| Purchaser | Changes that have occurred | Anticipated changes |
|---|---|---|
| *** | No. | No. |

7. a.) Have there been any changes in the business cycle for circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey since 2011?

   b.) Do you anticipate any changes in the business cycle for circular welded pipe in the U.S. market or in the market for circular welded pipe in Brazil, India, Korea, Mexico, Taiwan, Thailand, and/or Turkey within a reasonably foreseeable time?

| Purchaser | Changes that have occurred | Anticipated changes |
|---|---|---|
| *** | Substantial downturn in the energy sector has reduced the need for line pipe. | No. |