

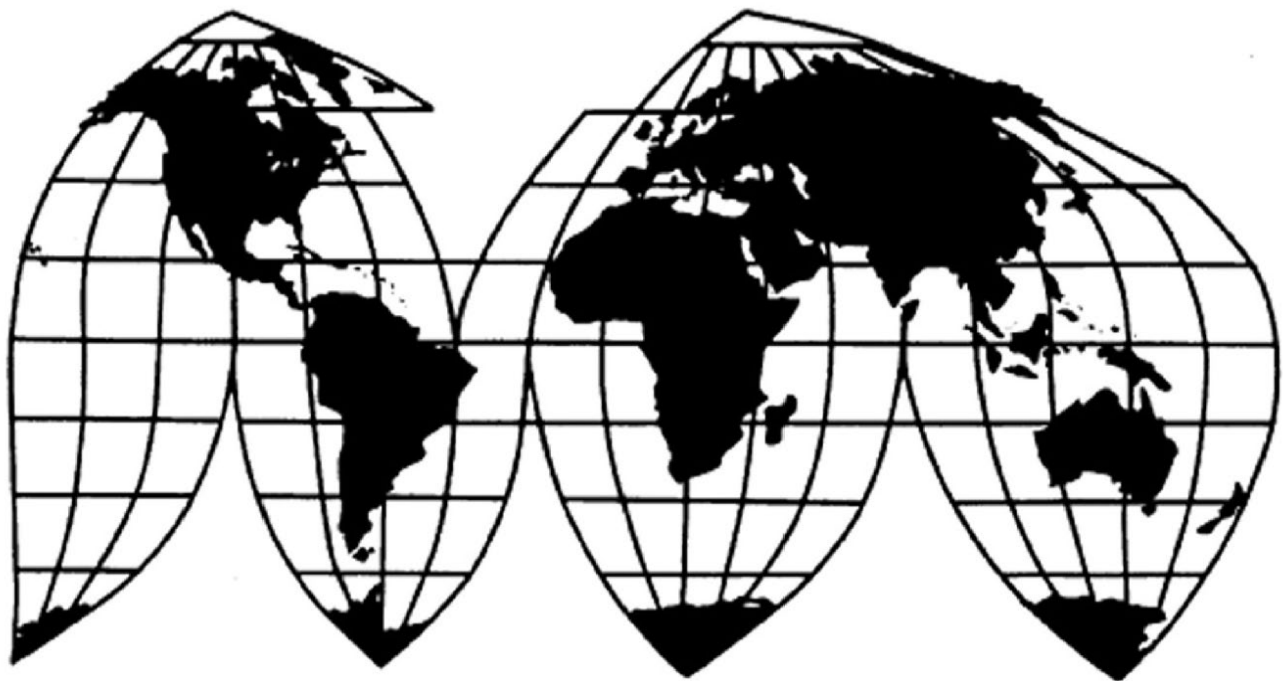
# Temporary Steel Fencing from China

Investigation Nos. 701-TA-754 and 731-TA-1732 (Final)

Publication 5727

April 2026

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published. Such information is identified by brackets ([ ]) in confidential reports and is deleted and replaced with asterisks (\*\*\*) in public reports. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.



# UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-754 and 731-TA-1732 (Final)

Temporary Steel Fencing from China

## DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of temporary steel fencing from China, provided for in subheading 7308.90.95 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”), and imports of the subject merchandise from China that have been found to be subsidized by the government of China.<sup>2 3</sup>

## BACKGROUND

The Commission instituted these investigations effective January 15, 2025, following receipt of petitions filed with the Commission and Commerce by ZND US Inc., Statesville, North Carolina. The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of temporary steel fencing from China were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on September 11, 2025 (90 FR 44103).<sup>4</sup> The Commission conducted its

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

<sup>2</sup> 91 FR 12567 and 91 FR 12577 (March 16, 2026).

<sup>3</sup> The Commission also finds that imports subject to Commerce’s affirmative critical circumstances determinations are not likely to undermine seriously the remedial effect of the countervailing and antidumping duty orders on temporary steel fencing from China.

<sup>4</sup> Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission tolled its schedule for this proceeding. The schedule was revised in subsequent notices published in the *Federal Register* on November 26, 2025 (90 FR 54368) and December 12, 2025 (90 FR

hearing on March 12, 2026. All persons who requested the opportunity were permitted to participate.

## Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of temporary steel fencing found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value and subsidized by the government of China. We also find that critical circumstances do not exist with respect to imports from China that are subject to Commerce’s final affirmative critical circumstances determinations in its antidumping and countervailing duty investigations.

### I. Background

ZND US Inc. (“ZND” or “petitioner”), a domestic producer of temporary steel fencing, filed the petitions in these investigations on January 15, 2025. Representatives appeared at the hearing with counsel and submitted prehearing and posthearing briefs and final comments.

Two respondent entities participated in these investigations. Sonco Worldwide (“Sonco”), a U.S. importer of subject merchandise, appeared at the hearing with counsel and submitted prehearing and posthearing briefs and final comments.<sup>1</sup> Direct Scaffold Supply LLC (“DSS”), a U.S. importer of subject merchandise, appeared at the hearing with counsel, but did not submit a brief.

U.S. industry data are based on the questionnaire responses from eight domestic producers that accounted for an estimated \*\*\* percent of domestic production of temporary steel fencing in 2025.<sup>2</sup> U.S. import data are based on questionnaire responses of 18 U.S. importers of temporary steel fencing over the January 2022-June 2025 period of investigation (“POI”), which accounted for an estimated \*\*\* percent of subject imports from China and virtually all nonsubject imports in 2024.<sup>3</sup> Data concerning the subject industry is based on questionnaire responses from three foreign producers that accounted for approximately \*\*\* percent of production of subject merchandise from China in 2024; these firms’ exports of

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<sup>1</sup> Representatives of Stephens Pipe and Steel (“Stephens Pipe”), a domestic producer of temporary steel fencing, and Federal Rent a Fence, a purchaser of temporary steel fencing, appeared with Sonco at the hearing.

<sup>2</sup> Confidential Report, Memoranda INV-YY-046 (March 31, 2026), INV-YY-050 (April 8, 2026) (“CR”) at 1.5; Public Report, *Temporary Steel Fencing from China*, Inv. Nos. 701-TA-754 and 731-TA-1732 (Final), USITC Pub. 5727 (April 2026) (“PR”) at 1.5.

<sup>3</sup> CR/PR at 1.5, Table 4.1. Seventeen of the 18 responding U.S. importers reported importing subject imports from China, with \*\*\* of these 17 importers also importing from nonsubject sources, and \*\*\* importing only from nonsubject sources. *Id.* at Table 4.1.

temporary steel fencing to the United States accounted for approximately \*\*\* percent of reported U.S. imports of subject merchandise in 2024.<sup>4</sup>

## II. Domestic Like Product

### A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”<sup>5</sup> Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>6</sup> In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”<sup>7</sup>

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.<sup>8</sup> Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”<sup>9</sup> The Commission then defines the domestic like product in light of the imported articles Commerce has identified.<sup>10</sup> The decision regarding the

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<sup>4</sup> CR/PR at Table 7.1.

<sup>5</sup> 19 U.S.C. § 1677(4)(A).

<sup>6</sup> 19 U.S.C. § 1677(4)(A).

<sup>7</sup> 19 U.S.C. § 1677(10).

<sup>8</sup> 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

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

<sup>10</sup> *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds (Continued...))

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

## **B. Product Description**

Commerce defined the scope of the imported merchandise under investigation as follows:

The merchandise subject to this investigation is temporary steel fencing. Temporary steel fencing consists of temporary steel fence panels and temporary steel fence stands. Temporary steel fence panels, when assembled with temporary steel fence stands or other types of stands outside of the scope, with each other, or with posts, create a free-standing fence. Temporary steel fence panels are covered by the scope regardless of whether they attach to a stand or the type of stand to which they connect.

Temporary steel fence panels have a welded frame of steel tubing and an interior consisting of chain link, steel wire mesh, or other steel materials that are not more than ten millimeters in actual diameter or width. The steel tubing may surround all edges of the temporary steel fence panel or only be attached along

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defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

<sup>11</sup> See, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

<sup>12</sup> See, e.g., S. Rep. No. 96-249 at 90-91 (1979).

<sup>13</sup> *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; see also S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

two parallel sides of the panel. All temporary steel fence panels with at least two framed sides are covered by the scope, regardless of the number of edges framed with steel tubing.

Temporary steel fence panels are typically between 10 and 12 feet long and six to eight feet high, though all temporary steel fence panels are covered by the scope regardless of dimension or weight as long as a single panel meets each of the three following criteria: (1) it has over seven and a half square feet in actual surface area; (2) it weighs more than four pounds; and (3) it weighs less than 1.92 pounds per square foot. Temporary steel fence panels may be square, rectangular, or have rounded edges, and may or may not have gates, doors, wheels, or barbed wire or other features, though all temporary steel fence panels are covered by the scope regardless of shape and other features. Temporary steel fence panels may have one or more horizontal, vertical, or diagonal reinforcement tubes made of steel welded to the inside frame, though all temporary steel fence panels are covered by the scope regardless of the existence, number, or type of reinforcement tubes attached to the panel. Temporary steel fence panels may have extensions, pins, tubes, or holes at the bottom of the panel, but all temporary steel fence panels are covered regardless of the existence of such features.

Steel fence stands are shapes made of steel that stand flat on the ground and have one or two open tubes or solid pins into which temporary steel fence panels are inserted to stand erect. The steel fence stand may be made of welded steel tubing or may be a flat steel plate with one or two tubes or pins welded onto the plate for connecting the panels.

Temporary steel fencing is covered by the scope regardless of coating, painting, or other finish. Both temporary steel fence panels and temporary steel fence stands are covered by the scope, whether imported assembled or unassembled, and whether imported together or separately.

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by coating, painting, assembling, attaching to, or packaging with another product, or any other finishing, assembly, or packaging operation that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the temporary steel fencing.

Temporary steel fencing is included in the scope of this investigation whether or not imported attached to, or in conjunction with, other parts and accessories such as posts, hooks, rings, brackets, couplers, clips, connectors, handles, brackets, or latches. If temporary steel fencing is imported attached to,

or in conjunction with, such non-subject merchandise, only the temporary steel fencing is included in the scope.

Excluded from the scope of this investigation are decorative steel fence panels. Decorative steel fence panels are steel fence panels that have all of the following characteristics: (i) the panel's long ends are no more than 48 inches; (ii) the panel's short ends are no more than 38 inches; (iii) the panel weighs 7 pounds or less; (iv) the panel is framed on all sides with steel tubing no wider than 10 mm; and (v) the panel's the interior contains a decorative pattern (meaning a pattern other than square, rectangular, diamond, or hexagonal meshing) accounting for at least 5 percent of the area within the frame.

Merchandise covered by this investigation is currently classified in the Harmonized Tariff Schedule of the United States (HTSUS) under the subheading 7308.90.9590. Subject merchandise may also enter under subheadings 7326.90.8688 and 7323.99.9080 of the HTSUS. The HTSUS subheadings set forth above are provided for convenience and U.S. Customs purposes only. The written description of the scope is dispositive.<sup>14</sup>

Temporary steel fencing consists of temporary steel fence panels and temporary steel fence stands used to create perimeters or enclosures to keep people and animals from moving in and out of spaces.<sup>15</sup> Temporary steel fencing panels consist of a frame of hollow structural steel tubing and a steel interior consisting of chain link, wire mesh, or other material.<sup>16</sup> The panels are connected to tubes or pins on the temporary steel fence stands to create a free-standing fence. Temporary steel fencing is almost always galvanized and can be painted or powder coated as well.<sup>17</sup> The applications for temporary steel fencing include, but are not limited to, fencing for construction sites, security perimeters, and events (*e.g.*, music festivals and sports events), as well as animal kennels.<sup>18</sup>

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<sup>14</sup> *Temporary Steel Fencing From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 91 Fed. Reg. 12567, 12569-12570 (March 16, 2026); *Temporary Steel Fencing From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 91 Fed. Reg. 12577, 12580-12581 (March 16, 2026).

<sup>15</sup> CR/PR at 1.15.

<sup>16</sup> CR/PR at 1.18.

<sup>17</sup> CR/PR at 1.15.

<sup>18</sup> CR/PR at 1.17.

### C. Arguments of the Parties

*Petitioner's Arguments.* Petitioner argues that the Commission should define a single domestic like product consisting of all temporary steel fencing, coextensive with the scope.<sup>19</sup> In particular, it argues that animal enclosures and perimeter fencing should not be defined to be separate domestic like products.<sup>20</sup> It contends that animal enclosures and perimeter fencing share the same core physical characteristics and are designed to perform the same tasks of creating a barrier that encloses an area and prevents the entry or exit of people or animals. It states that both animal kennels and perimeter fencing come in a wide range of sizes and configurations, and both are assembled from the same basic components: welded steel tube frames and a steel wire interior, joined together with couplers. Thus, it states that animal kennels are simply a specific configuration and end-use application of the same panelized fencing products, rather than a separate product, and that none of the purported distinctions between animal enclosures and perimeter fencing advanced by Sonco is supported by the record.<sup>21</sup>

Petitioner contends that animal kennels and other temporary steel fencing share common manufacturing facilities, production processes, and employees,<sup>22</sup> are sold through overlapping channels of distribution, and are marketed alongside each other.<sup>23</sup> Petitioner contends that animal enclosures are interchangeable with perimeter fencing.<sup>24</sup> It further argues that customer and producer perceptions support a single product category.<sup>25</sup> Petitioner contends that prices for animal kennels and other temporary steel fencing vary by size,

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<sup>19</sup> Petitioner's Prehearing Brief at 4-18. No party has argued in the final phase of these investigations that the Commission should define fence panels with wire mesh interiors and fence panels with chain link interior to be separate domestic like products.

<sup>20</sup> Petitioner's Prehearing Brief at 8-18; Petitioner's Posthearing Brief at 1-5 and Answers to Commissioner Questions at 1-18.

<sup>21</sup> Petitioner's Prehearing Brief at 8-10; Petitioner's Posthearing Brief at 1-2 and Answers to Commissioner Questions at 2-3, 6-8.

<sup>22</sup> Petitioner's Prehearing Brief at 11; Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 10-11.

<sup>23</sup> Petitioner's Prehearing Brief at 13-14; Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 12.

<sup>24</sup> Petitioner's Prehearing Brief at 14-15 and Exh. 4; Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 13.

<sup>25</sup> Petitioner's Prehearing Brief at 13-14; Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 13.

gauge/grade, and finish, but that there are no clear dividing lines that would justify treating animal kennels as a distinct like product.<sup>26</sup>

Petitioner argues that, in light of the many similarities between animal enclosures and perimeter fencing, it was necessary to include animal enclosures within the scope of the petitions to prevent circumvention of any orders that may be issued. It further asserts that respondents have been unable to identify any meaningful distinction between animal enclosures and perimeter fencing that would allow U.S. Customs and Border Protection to prevent circumvention at the border, arguing that this indicates that there is no technical or physical dividing line between animal enclosures and other temporary steel fencing.<sup>27</sup>

*Respondent's Arguments.* Sonco argues that the Commission should define animal enclosures and perimeter fencing as separate domestic like products.<sup>28</sup>

Sonco contends that the two product categories have different end uses, with animal enclosure fencing designed to create free-standing kennels for animals, while perimeter fencing is used as perimeters for crowd control at event venues and construction sites. It asserts that animal enclosure fencing is not designed to be “temporary,” but rather is generally used for long-term animal kennels that stay in one location.<sup>29</sup>

Sonco argues that there are key physical differences between the two, in that animal enclosure panels are designed to connect together to form free-standing enclosures and are not attached to posts and stands. By contrast, it asserts that perimeter fencing requires stands so that panels can create extensive perimeter barriers, and is not designed to form small, free-standing connected enclosures. Sonco contends that animal fencing tends to be smaller, made with lighter weight, less durable materials, while perimeter fencing tends to be larger and requires stronger material to withstand being regularly repositioned throughout a worksite.<sup>30</sup>

Sonco asserts that most domestic producers produce either animal enclosures or perimeter fencing, but not both, so there is limited overlap in manufacturing facilities and employees producing the two products.<sup>31</sup> It contends that there are clear distinctions in channels of distribution, with the vast majority of animal enclosure fencing sold to retailers, while rental companies and end users account for the vast majority of shipments of perimeter

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<sup>26</sup> Petitioner’s Prehearing Brief at 16-17; Petitioner’s Posthearing Brief, Answers to Commissioner Questions, at 14-15.

<sup>27</sup> Petitioner’s Posthearing Brief at 4-5 and Answers to Commissioner Questions at 16-18.

<sup>28</sup> Sonco’s Prehearing Brief at 1-4, 13-14.

<sup>29</sup> Sonco’s Prehearing Brief at 3-5.

<sup>30</sup> Sonco’s Prehearing Brief at 5-7.

<sup>31</sup> Sonco’s Prehearing Brief at 7-8; Sonco’s Posthearing Brief at A.8; Hearing Tr. at 135 (Cochran).

fencing.<sup>32</sup> Sonco argues that animal enclosure fencing and perimeter fencing are not used interchangeably, and that to the extent that it is possible that they could be used interchangeably, it would not be practical to do so.<sup>33</sup> Sonco asserts that producers and customers both view perimeter fencing and animal enclosures as separate products.<sup>34</sup> It contends that the Commission's pricing data show that domestic producers' animal enclosures consistently sold at higher prices than perimeter fencing.<sup>35</sup>

Sonco argues that petitioner's assertions about hypothetical future circumvention problems by imports are irrelevant and a distraction from the Commission's current domestic like product analysis, which deals with domestically produced temporary steel fencing.<sup>36</sup>

#### **D. Analysis**

Based on the record, we define a single domestic like product consisting of all temporary steel fencing, coextensive with Commerce's scope.

In the preliminary determinations, the Commission defined a single domestic like product coextensive with the scope, consisting of temporary steel fencing, as petitioner had advocated.<sup>37</sup> The Commission declined to define chain link temporary steel fencing and wire mesh temporary steel fencing as separate domestic like products, and declined to make any finding with respect to including out-of-scope permanent fencing in the domestic like product.<sup>38</sup> We are not aware of any information on the record that requires revisiting these issues.

The Commission also declined to define animal kennels to be a separate domestic like product from perimeter fencing, finding that the evidence in the record did not indicate the existence of a clear dividing line between those two types of fencing, particularly given the parties' agreement that the Commission did not have adequate data to make determinations based on separate domestic like products and domestic industries for animal kennels and perimeter fencing.<sup>39</sup> In its comments on the Commission's draft final phase questionnaires,

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<sup>32</sup> Sonco's Prehearing Brief at 9; Sonco's Posthearing Brief at A.9-A.10.

<sup>33</sup> Sonco's Prehearing Brief at 11; Sonco's Posthearing Brief at A.8; Hearing Tr. at 134-35 (Cochran).

<sup>34</sup> Sonco's Prehearing Brief at 11-12; Sonco's Posthearing Brief at A.8; Hearing Tr. at 135 (Cochran).

<sup>35</sup> Sonco's Prehearing Brief at 13.

<sup>36</sup> Sonco's Posthearing Brief at A.11-A.13.

<sup>37</sup> *Temporary Steel Fencing from China*, Inv. Nos. 701-TA-754 and 731-TA-1732 (Preliminary, USITC Pub. 5597 at 8, 18 (March 2025) ("*Preliminary Determinations*").

<sup>38</sup> *Preliminary Determinations*, USITC Pub. 5597 at 13-15, 18.

<sup>39</sup> *Preliminary Determinations*, USITC Pub. 5597 at 15-18.

Sonco requested that the Commission collect data separately with respect to proposed separate domestic like products consisting of animal enclosures and perimeter fencing. The Commission implemented that request in its final phase questionnaires.<sup>40</sup>

*Physical Characteristics and Uses.* To the extent animal enclosure fencing and perimeter fencing are defined as such, by definition they have different end uses. According to Sonco, animal enclosure fencing is designed to create free-standing kennels for animals, while perimeter fencing is used to create enclosures for crowd control at large event venues and construction sites.<sup>41</sup> However, there are no physical characteristics that would prevent perimeter fencing from enclosing animals, and the affidavit from \*\*\* states that the firm has \*\*\*, which petitioner contends indicates an overlap in end uses.<sup>42</sup> Moreover, purchaser \*\*\* reported that \*\*\*,<sup>43</sup> and importer \*\*\* reported that “\*\*\*\*.”<sup>44</sup>

Petitioner asserts that animal enclosure fencing and perimeter fencing have the same physical characteristics, are made from the same raw materials, and that there are overlaps between the two in the characteristics emphasized by Sonco as differences. The record provides some support for this assertion in that it indicates that all temporary steel fencing panels consist of a frame of hollow structural steel tubing and a steel interior consisting of chain link, wire mesh, or other steel materials.<sup>45</sup> In addition, the major raw materials used to produce fencing panels, whether to enclose animals or for other purposes, include steel pipe and tubing for the outer frame, and steel wire for the interior.<sup>46</sup>

Sonco argues that, reflecting their different end uses, animal enclosures have a number of physical differences from perimeter fencing, which petitioner disputes.

- Sonco asserts that animal enclosure fencing is not designed to be “temporary,” but rather is generally used for long-term animal kennels staying in one location.

Petitioner argues that marketing of animal enclosure fencing highlights the ability to

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<sup>40</sup> CR/PR at 1.21. However, the Commission did not implement Sonco’s request that it collect data separately for out-of-scope “permanent fencing,” given that Sonco did not provide a definition of “permanent fencing.” *Id.* at n.57.

<sup>41</sup> Sonco’s Prehearing Brief at 5.

<sup>42</sup> Petitioner’s Prehearing Brief, Exh. 4 (affidavit of \*\*\*) at Paragraph 5); Petitioner’s Posthearing Brief, Answers to Commissioner Questions at 8-9.

<sup>43</sup> CR/PR at Table D.3; *see also* \*\*\* U.S. Purchaser Questionnaire Response at II-1a, II-1b, III-3 (EDIS Doc. 873760) (showing that \*\*\*)

<sup>44</sup> CR/PR at Table D.2.

<sup>45</sup> CR/PR at 1.18.

<sup>46</sup> CR/PR at 5.1.

assemble and disassemble such fencing, refuting Sonco's assertion that animal enclosures are not designed to be temporary.<sup>47</sup>

- Sonco contends that animal enclosures differ in that they are designed to connect together to form free-standing enclosures, with individual panels not connected to posts and stands. Petitioner argues that just like animal enclosure panels, perimeter fencing panels can be assembled together in a free-standing enclosure without stands, as in "tree enclosures" seen around Washington D.C.<sup>48</sup>
- Sonco states that animal enclosure fencing tends to be smaller, made with lighter weight, less durable materials, including lighter gauge wire. It states that \*\*\*.<sup>49</sup> A Stephens Pipe witness testified that the firm's animal kennels do not use stands, are made with lighter gauge wire and have only two welds at the bottom, as compared with a four-point weld for perimeter fencing panels, which need to be sturdier.<sup>50</sup> Petitioner disputes that animal enclosures are smaller, of lighter weight, and made of less durable materials than perimeter fencing, stating that the record shows that there is substantial overlap between the two in sizes, weights, and wire gauges.<sup>51</sup>
- A Stephens Pipe witness testified that animal kennels are sold in kits.<sup>52</sup> Petitioner disputes that animal enclosures are distinguished by being only sold in kits, contending that individual animal enclosure panels are readily available in the market, including from Stephens Pipe.<sup>53</sup>
- \*\*\* further reports that animal enclosure fencing must be transported vertically while perimeter fencing can be stacked, and animal enclosure fencing has a rounded top corner.<sup>54</sup>
- Petitioner contends that both animal enclosure fencing and perimeter fencing have gates and doors, so this does not provide a distinction between the two.<sup>55</sup>

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<sup>47</sup> Sonco's Prehearing Brief at 4; Petitioner's Posthearing Brief at 1 and Answers to Commissioner Questions at 9.

<sup>48</sup> Sonco's Prehearing Brief at 5; Petitioner's Posthearing Brief at 1-2 and Answers to Commissioner Questions at 6-7.

<sup>49</sup> Sonco's Prehearing Brief at 7.

<sup>50</sup> Sonco's Posthearing Brief at A.8; Hearing Tr. at 134-35 (Cochran).

<sup>51</sup> Petitioner's Posthearing Brief at 2 and Answers to Commissioner Questions at 5-6.

<sup>52</sup> Sonco's Posthearing Brief at A.8; Hearing Tr. at 134-35 (Cochran).

<sup>53</sup> Petitioner's Posthearing Brief at 2.

<sup>54</sup> CR/PR at 1.22, Table D.1. Domestic producer \*\*\* reported that \*\*\*. CR/PR at Table

D.1.

<sup>55</sup> Petitioner's Posthearing Brief at 2.

Although Sonco has alleged a number of general differences between animal enclosure fencing and perimeter fencing, it generally frames them as characteristics that “tend to be” or are “typically” different between the two,<sup>56</sup> rather than factors, whether individually or in combination, that establish a clear dividing line in physical characteristics.

The definition of “animal enclosure fencing” suggested by Sonco and adopted in the Commission’s questionnaires does not specify physical characteristics that clearly differentiate the two types of fencing:

*Animal Enclosure Fencing.* Temporary steel fencing included in the scope of the investigation (defined above) that is designed to establish a free-standing enclosure for animals. Animal enclosure fencing is typically sold as a kit that contains at least four fence panels, including a panel with hinges or a hinged door and intended to be assembled by the consumer.

At the hearing, Sonco was unable to come up with a more precise definition of its proposed separate like product for Customs purposes.<sup>57</sup>

A majority of responding firms reported that animal enclosure fencing and other temporary steel fencing are somewhat or never/not-at-all comparable with respect to physical characteristics and uses (four of seven U.S. producers, six of eight U.S. importers, and four of five U.S. purchasers).<sup>58</sup>

*Manufacturing Facilities, Production Processes, and Employees.* Three out of eight domestic producers reported producing both animal enclosures and perimeter fencing: \*\*\*, Stephens Pipe, and \*\*\*.<sup>59</sup> U.S. producers reported a total of four “establishments” at which animal enclosures and other temporary fencing were both produced.<sup>60</sup>

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<sup>56</sup> For example, Sonco’s Prehearing Brief asserts that “animal enclosure fencing *tends to be* smaller and made with lighter weight, less durable materials, including lighter gauge wire.” Sonco’s Prehearing Brief at 7 (emphasis added). The definition of animal enclosure fencing suggested by Sonco for use in the Commission’s questionnaires states that “[a]nimal enclosure fencing is *typically* sold as a kit ...”.

<sup>57</sup> Hearing Tr. at 202-04 (Argenti).

<sup>58</sup> CR/PR at Table 1.5.

<sup>59</sup> CR/PR at Table 3.1.

<sup>60</sup> CR/PR at Table 1.7. \*\*\* reported that at \*\*\* of its \*\*\* establishments, it produced both animal enclosures and other temporary steel fencing; Stephens Pipe reported \*\*\*, at which it produced animal enclosures and other temporary steel fencing; \*\*\* reported that at \*\*\* of its \*\*\*, it produced both animal enclosures and other temporary steel fencing. None of the three producers reported producing \*\*\* at any of its establishments. \*\*\* U.S. Producer Questionnaire Response at 1.2a (EDIS Document No. \*\*\*); \*\*\* U.S. Producer Questionnaire Response at 1.2a (EDIS Document No. \*\*\*); \*\*\* U.S. Producer Questionnaire Response at 1.2a (EDIS Document No. \*\*\*).

Stephens Pipe, which accounted for \*\*\* percent of U.S. production of animal enclosure fencing and \*\*\* percent of U.S. production of other temporary steel fencing, reported that “\*\*\*.”<sup>61</sup> A Stephens Pipe representative testified that the firm’s “animal enclosures are manufactured separately in separate locations by different people” from its perimeter fencing.<sup>62</sup>

\*\*\*, which accounted for \*\*\* percent of U.S. production of animal enclosure fencing and \*\*\* percent of U.S. production of other temporary steel fencing, reported that the manufacturing process was \*\*\* for both animal enclosures and perimeter fencing, but there were some differences in \*\*\*: \*\*\*.<sup>63</sup> An affidavit from \*\*\* states that kennel panels and temporary steel panels are “made from the same raw materials” and “{t}he manufacturing process is very similar for both.”<sup>64 65</sup>

Responding firms noted some differences in the manufacturing process, such as curving the frame for animal enclosure fencing versus manufacturing an open bottom frame to be placed on a stand for perimeter fencing, and that animal enclosure fencing includes kit assembly parts such as doors, hinges, latches, and optional roof/partition components.<sup>66</sup>

Thus, there are similarities in the manufacturing process between animal enclosure fencing and perimeter fencing, but also differences in the specific processes and machinery used and components produced. While animal enclosure fencing and perimeter fencing may be produced by domestic producers in the same general facility, there is no indication that they are produced by any domestic producer with the same equipment and the same personnel, and Stephens Pipe stated that it produces them in different locations with different people.

*Channels of Distribution.* There are differences in channels of distribution between animal enclosure fencing and perimeter fencing. A large majority (more than 80 percent) of U.S. producers’ U.S. shipments of animal enclosure fencing went to retailers, with much smaller shares going to distributors and end users, and \*\*\* shipments going to fence rental companies.<sup>67</sup> By contrast, the largest share of U.S. producers’ U.S. shipments of other

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<sup>61</sup> CR/PR at Tables 3.1, D.1.

<sup>62</sup> Hearing Tr. at 134-35 (Cochran).

<sup>63</sup> CR/PR at Table 3.1, D.1.

<sup>64</sup> Petitioner’s Prehearing Brief at Exh. 4 (affidavit of \*\*\* at Paragraph 5).

<sup>65</sup> The third U.S. producer of both types of fencing, \*\*\*, accounted for \*\*\* percent of U.S. production of animal enclosure fencing and \*\*\* percent of U.S. production of other temporary steel fencing, but reported that it had \*\*\*. CR/PR at Tables 3.1, D.1.

<sup>66</sup> CR/PR at 1.24.

<sup>67</sup> The share of U.S. producers’ U.S. shipments of animal enclosure fencing going to retailers during the full years of the POI ranged from \*\*\* percent to \*\*\* percent; the share going to distributors (Continued...)

temporary steel fencing went to rental companies, with substantial shares going to distributors and end users, and a \*\*\* share going to retailers.<sup>68</sup> Although there is \*\*\* overlap between the two in sales to \*\*\*, there is some overlap in sales to distributors, end users, and retailers.<sup>69</sup>

The parties agree that animal enclosures and perimeter fencing may be sold at the same retail outlets, but Sonco contends that retailers market them under different categories, while petitioner contends that retailers market them alongside each other in the same category.<sup>70</sup> The Stephens Pipe representative testified that animal enclosure fencing and perimeter fencing “live in entirely different worlds” from a commercial standpoint, in that it sells its animal kennels through a dedicated sales team to big box retailers and its perimeter fencing through its regular sales force to fence rental companies and contractors.<sup>71</sup>

A majority of responding U.S. producers (four of five) reported that the channels of distribution for animal enclosure fencing and other temporary steel fencing are fully or mostly comparable, while majorities of responding U.S. importers (four of seven) and U.S. purchasers (three of five) reported that they are somewhat or never comparable.<sup>72</sup>

*Interchangeability.* As noted, \*\*\* submitted an affidavit stating that his firm has \*\*\*, indicating some degree of interchangeability between animal enclosure fencing and perimeter fencing.<sup>73</sup> As previously noted, purchaser \*\*\* reported that \*\*\*,<sup>74</sup> and importer \*\*\* reported that “\*\*\*.”<sup>75</sup>

Sonco argues that as a practical matter, interchangeability is limited between animal enclosure fencing and perimeter fencing, noting the Stephens Pipe witness’s testimony that “[n]obody is going out and buying a kennel panel to use as a temp panel. If they are, they’re just wasting their money because it’s not as sturdy.”<sup>76</sup> However, as discussed below, data on

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ranged from \*\*\* percent to \*\*\* percent, and the share going to end users ranged from \*\*\* percent to \*\*\* percent, and the share going to rental companies was \*\*\* throughout the POI. CR/PR at Table 1.6.

<sup>68</sup> The share of U.S. producers’ U.S. shipments of other temporary steel fencing going to rental companies during the full years of the POI ranged from \*\*\* percent to \*\*\* percent; the share going to distributors ranged from \*\*\* percent to \*\*\* percent, the share going to end users ranged from \*\*\* percent to \*\*\* percent, and the share going to retailers ranged from \*\*\* percent to \*\*\* percent. CR/PR at Table 1.6.

<sup>69</sup> CR/PR at Table 1.6.

<sup>70</sup> Sonco’s Posthearing Brief at A.9-A.10; Petitioner’s Posthearing Brief, Answers to Commissioner Questions, at 12.

<sup>71</sup> Hearing Tr. at 135 (Cochran). By contrast, \*\*\* reported that \*\*\*. CR/PR at Table D.1.

<sup>72</sup> CR/PR at 1.23, Table 1.5.

<sup>73</sup> Petitioner’s Prehearing Brief at 10 and Exh. 4 at Paragraph 5.

<sup>74</sup> CR/PR at Table D.3.

<sup>75</sup> CR/PR at Table D.2.

<sup>76</sup> Hearing Tr. at 134 (Cochran); Sonco’s Posthearing Brief at A.8.

pricing as between animal enclosure fencing and perimeter fencing are mixed. Importer \*\*\* reported that perimeter fencing could be used as animal enclosure fencing, but would be missing the door, while animal enclosure fencing could be used as a perimeter fence, but would have additional parts left over.<sup>77</sup> Importer/purchaser \*\*\* reported that \*\*\*.<sup>78</sup> As noted above, however, perimeter fencing may include doors and gates. Importer \*\*\* reported that \*\*\*,<sup>79</sup> purchaser \*\*\* reported \*\*\* and purchaser \*\*\* reported that \*\*\*.<sup>80</sup>

A majority of responding firms reported that animal enclosure fencing and other temporary steel fencing are somewhat or never comparable in terms of interchangeability (five of seven U.S. producers, six of eight U.S. importers, and four of five U.S. purchasers).<sup>81</sup>

*Producer and Customer Perceptions.* As previously noted, U.S. producer Stephens Pipe indicates that it views animal enclosure fencing and perimeter fencing as separate products: “[d]ifferent projects, different customers, different products different channels, different end users.”<sup>82</sup> By contrast, \*\*\* views them as very similar, with the same physical characteristics, made from the same raw materials, and a very similar manufacturing process.<sup>83</sup>

Importer \*\*\* reported that \*\*\*, while importer \*\*\* reported: \*\*\*.<sup>84</sup> Importer \*\*\* reported that \*\*\*.<sup>85</sup>

A majority of responding firms reported that animal enclosure fencing and other temporary steel fencing are somewhat or never/not-at-all comparable in terms of customer and producer perceptions (four of seven U.S. producers, five of seven U.S. importers, and four of five U.S. purchasers).<sup>86</sup>

*Price.* The Commission’s pricing data show that domestic producers’ prices for pricing product 7 (an animal enclosure panel) were \*\*\* higher than domestic producers’ prices for products 1 (a welded wire mesh perimeter fencing panel sold to fence rental companies) and 3 (a welded wire mesh perimeter fencing panel sold to distributors).<sup>87</sup> Prices per linear foot for product 1 ranged from \$\*\*\* to \$\*\*\* during the POI, while domestic producers’ prices per linear

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<sup>77</sup> CR/PR at 1.22.

<sup>78</sup> CR/PR at Table D.3.

<sup>79</sup> CR/PR at Table D.2.

<sup>80</sup> CR/PR at Table D.3.

<sup>81</sup> CR/PR at Table 1.5.

<sup>82</sup> Hearing Tr. at 135 (Cochran).

<sup>83</sup> Petitioner’s Prehearing Brief at Exh. 4 (affidavit of \*\*\* at Paragraph 5).

<sup>84</sup> CR/PR at Table D.2.

<sup>85</sup> CR/PR at Table D.2.

<sup>86</sup> CR/PR at Table 1.5.

<sup>87</sup> CR/PR at Table 5.14.

foot for product 3 ranged from \$\*\*\* to \$\*\*\*; by contrast, domestic producer's prices per linear foot for product 7 ranged from \$\*\*\* to \$\*\*\*.<sup>88</sup>

However, the average unit values ("AUVs") for U.S. producers' U.S. shipments of other temporary steel fencing were \*\*\* but \*\*\* those for their U.S. shipments of animal enclosure temporary steel fencing throughout the POI.<sup>89</sup> The AUVs for other temporary steel fencing ranged from a low of \$\*\*\* per pound in 2023 to a high of \$\*\*\* per pound in interim 2024, while the AUV for animal enclosure temporary steel fencing ranged from a low of \$\*\*\* per pound in 2023 to a high of \$\*\*\* per pound in interim 2025.<sup>90</sup>

The majority of U.S. importers (five of six) and purchasers (three of four) reported that price is somewhat or never/not-at-all comparable between animal enclosure fencing and other temporary steel fencing, while a majority of U.S. producers (three of five) reported that price is always or usually comparable.<sup>91</sup> Some firms reported that animal enclosure fencing was more expensive, some reported that other temporary steel fencing was more expensive, and some reported not being aware of price differences between the two.<sup>92</sup>

*Conclusion.* The record shows both similarities and differences between animal enclosure fencing and perimeter fencing. It is clear that, by definition, animal enclosure fencing and perimeter fencing generally have different end uses. However, it is much less clear to what extent they have significantly different physical characteristics. Sonco has argued that a number of asserted characteristics in animal enclosure fencing are distinct from those for perimeter fencing, but it generally presents them as tending to be true of most animal enclosure fencing, rather than a definition of animal enclosure fencing based on physical characteristics that are distinct from those for perimeter fencing. Moreover, almost all of these characteristics have some degree of overlap with perimeter fencing, as petitioner has demonstrated. Even as to end use, while by definition animal enclosure fencing is used to enclose animals, there are no physical characteristics that prevent perimeter fencing from also being used to enclose animals; for example, perimeter fencing may include gates or doors. And there is evidence that at times animal enclosure fencing has been sold to enclose a perimeter.

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<sup>88</sup> CR/PR at Table 5.14.

<sup>89</sup> CR/PR at Table 1.8.

<sup>90</sup> CR/PR at Table 1.8. However, there may be product mix/comparability issues with respect to both the pricing and AUV data. The Stephens Pipe witness testified that "pricing comparisons between {animal enclosure fencing and perimeter fencing} are not meaningful because animal kennels are sold only as assembled kits. Hearing Tr. at 135 (Cochran).

<sup>91</sup> CR/PR at Table 1.5.

<sup>92</sup> CR/PR at 1.25.

Thus, the record indicates no clear dividing line in physical characteristics between animal enclosure fencing and perimeter fencing.

As to manufacturing facilities, processes, and employees and channels of distribution, the record generally shows more differences than similarities but there is some overlap.

The record indicates some degree of interchangeability between animal enclosure fencing and perimeter fencing, given specific examples of a customer purchasing animal enclosure fencing for use on a construction site, and other firms reporting that they and their customers may use them interchangeably. However, there appear to be some limitations on the practical interchangeability of animal enclosure fencing and perimeter fencing.

The record indicates that some producers and customers perceive animal enclosure fencing and perimeter fencing to be part of the same product, but a number of firms view them as different products. We note, however, that the lack of a clear definition of animal enclosure fencing based on physical characteristics may skew perceived differences, as purchasers would essentially be reporting whether fencing for one end use (to enclose animals) is the same as fencing for another end use (to enclose a perimeter), when, as discussed above, there is no clear dividing line between the two based on physical characteristics.

The information in the record on price is of limited probative value, given the mixed evidence as between the pricing and shipment AUV data and market participants' differing views.

Thus, while the record shows some differences between animal enclosure fencing and perimeter fencing with respect to channels of distribution, interchangeability, manufacturing facilities and processes, and producer and customer perceptions, in each case there are some overlaps. Ultimately, we find that the absence of clear differences in physical characteristics that would allow definitions clearly distinguishing animal enclosure fencing from perimeter fencing prevents there from being a clear dividing line between these two types of temporary steel fencing. Indeed, the absence of such a definition affects consideration of the other like product factors, such as end use and producer and customer perceptions, as mentioned. In the absence of such a clear dividing line, we define a single domestic like product consisting of temporary steel fencing, coextensive with Commerce's scope.

### **III. Domestic Industry**

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes

a major proportion of the total domestic production of the product.”<sup>93</sup> In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.<sup>94</sup> Exclusion of such a producer is within the Commission’s discretion based upon the facts presented in each investigation.<sup>95</sup>

Domestic producers \*\*\* are potentially subject to the related parties provision because they imported subject merchandise during the POI.<sup>96</sup> We examine below whether appropriate circumstances to exclude any of these firms from the domestic industry.

\*\*\*. \*\*\* was the \*\*\* U.S. producer of temporary steel fencing in 2024, accounting for \*\*\* percent of U.S. production.<sup>97</sup> \*\*\* opposes the petitions.<sup>98</sup> \*\*\* imports of subject merchandise were \*\*\* pounds in 2022, \*\*\* pounds in 2023, \*\*\* pounds in 2024, and \*\*\* pounds in interim 2025, compared with \*\*\* pounds in interim 2024.<sup>99</sup> The firm’s domestic production was \*\*\* pounds in 2022, \*\*\* pounds in 2023, \*\*\* pounds in 2024, and \*\*\* pounds in interim 2025,

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<sup>93</sup> 19 U.S.C. § 1677(4)(A).

<sup>94</sup> See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int’l Trade 1992), *aff’d without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int’l Trade 1989), *aff’d mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int’l Trade 1987).

<sup>95</sup> The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

(1) the percentage of domestic production attributable to the importing producer;  
(2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);

(3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;

(4) the ratio of import shipments to U.S. production for the imported product; and

(5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int’l. Trade 2015); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

<sup>96</sup> CR/PR at 3.3., 3.16.

<sup>97</sup> CR/PR at Table 3.1.

<sup>98</sup> CR/PR at Table 3.1.

<sup>99</sup> CR/PR at Table 3.13.

compared with \*\*\* pounds in interim 2024.<sup>100</sup> The ratio of the firm's imports of subject merchandise to its domestic production was \*\*\* percent in 2022, \*\*\* percent in 2023, \*\*\* percent in 2024, and \*\*\* percent in interim 2025, compared with \*\*\* percent in interim 2024.<sup>101</sup> \*\*\* reported its reasons for importing as \*\*\*.<sup>102</sup> \*\*\* did not provide usable data to determine its operating-income-to-net-sales ratio during the POI, and did not report \*\*\* during the POI.<sup>103</sup>

Since \*\*\* is the \*\*\* U.S. producer of temporary steel fencing, and the ratio of its subject imports to its domestic production is low, its primary interest appears to be in domestic production and not in importation of subject merchandise.<sup>104</sup> Furthermore, given that the firm did not supply usable financial data, its inclusion in the domestic industry would not affect the industry's financial data and in any event there is no information on the record that \*\*\* imports benefited its domestic production operations to such an extent that its inclusion would mask injury from subject imports.<sup>105</sup> Moreover, no party has argued that it should be excluded from the domestic industry. Therefore, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. \*\*\* was the \*\*\* U.S. producer of temporary steel fencing in 2024, accounting for \*\*\* percent of U.S. production.<sup>106</sup> \*\*\* opposes the petitions.<sup>107</sup> \*\*\* imports of subject merchandise were \*\*\* pounds in 2022 and 2023, \*\*\* pounds in 2024, and \*\*\* pounds in interim 2025.<sup>108</sup> The firm's reported domestic production was \*\*\* pounds in 2022, 2023, and 2024, and \*\*\* pounds in interim 2025.<sup>109</sup> The ratio of the firm's imports of subject merchandise to its domestic production was \*\*\* percent in 2022 and 2023, \*\*\* percent in 2024, and \*\*\* percent in interim 2025.<sup>110</sup> However, Commission staff believes that \*\*\*. Based on proprietary, Census-

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<sup>100</sup> CR/PR at Table 3.13.

<sup>101</sup> CR/PR at Table 3.13.

<sup>102</sup> CR/PR at Table 3.16.

<sup>103</sup> CR/PR at 6.1 n.2, Table 6.5.

<sup>104</sup> In Commissioner Kearns' view, \*\*\* low ratio of subject imports to domestic production more importantly indicates that \*\*\* inclusion in the domestic industry would not skew industry data in such a way that would mask injury to the industry.

<sup>105</sup> Commissioner Kearns adds that, even if \*\*\* benefited from the \*\*\* percent of total subject imports that it imported during the POI, derived from CR/PR at Tables 3.13 and 4.2, there is no indication that it was shielded from the vast majority of subject imports that entered the U.S. market during the period.

<sup>106</sup> CR/PR at Table 3.1.

<sup>107</sup> CR/PR at Table 3.1.

<sup>108</sup> CR/PR at Table 3.14.

<sup>109</sup> CR/PR at Table 3.14.

<sup>110</sup> CR/PR at Table 3.14.

edited Customs import records, \*\*\* ratio of imports from China to U.S. production was \*\*\* percent in \*\*\* and \*\*\* percent in \*\*\*.<sup>111</sup>

\*\*\* reported its reason for importing as \*\*\*.<sup>112</sup> In addition to its importation of subject merchandise, \*\*\* also purchased subject imports from China: \*\*\* pounds in 2022, \*\*\* pounds in 2023, \*\*\* pounds in 2024, and \*\*\* pounds in interim 2025, compared with \*\*\* pounds in interim 2024.<sup>113</sup>

\*\*\* operating-income-to-net-sales ratio was \*\*\* percent in 2022, \*\*\* percent in 2023, \*\*\* percent in 2024, and \*\*\* percent in interim 2025, compared with \*\*\* percent in interim 2024, which was \*\*\* than the domestic industry's overall operating ratio \*\*\* calendar years and interim periods during the POI.<sup>114</sup> \*\*\* reported \*\*\* capital expenditures during the POI.<sup>115</sup>

\*\*\* is a \*\*\* U.S. producer, which imported subject merchandise in \*\*\* year of the POI, and was \*\*\*. While the ratio of the firm's reported imports to its domestic production in \*\*\* was \*\*\*, the ratio of its imports as reported in proprietary Census-edited Customs data to its domestic production was \*\*\*. Furthermore, \*\*\* is \*\*\* a producer for its inclusion in the domestic industry dataset to skew the data for the domestic industry in a way that would mask injury to the domestic industry, even to the extent that its imports of subject merchandise had the effect of benefiting its domestic production operations.<sup>116</sup> Moreover, no party has argued that the firm should be excluded from the domestic industry. Therefore, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.

\*\*\*. \*\*\* is \*\*\* and was the \*\*\* U.S. producer of temporary steel fencing in 2024, accounting for \*\*\* percent of U.S. production.<sup>117</sup> \*\*\* imports of subject merchandise were \*\*\* pounds in 2022, \*\*\* pounds in 2023, \*\*\* pounds in 2024, and \*\*\* pounds in interim 2025, compared with \*\*\* pounds in interim 2024.<sup>118</sup> The firm's domestic production was \*\*\* pounds in 2022, \*\*\* pounds in 2023, \*\*\* pounds in 2024, and \*\*\* pounds in interim 2025, compared with \*\*\* pounds in interim 2024. The ratio of the firm's imports of subject merchandise to its domestic production was \*\*\* percent in 2022, \*\*\* percent in 2023, \*\*\* percent in 2024, and

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<sup>111</sup> See CR/PR at 3.16 n.10.

<sup>112</sup> CR/PR at Table 3.16.

<sup>113</sup> CR/PR at Table 3.17.

<sup>114</sup> CR/PR at Table 6.3.

<sup>115</sup> CR/PR at Table 6.5.

<sup>116</sup> Commissioner Kearns adds that, even if \*\*\* benefited from the \*\*\* percent of total subject imports that it imported and purchased during the POI, derived from CR/PR at Tables 3.14, 3.17, and 4.2, there is no indication that it was shielded from the vast majority of subject imports that entered the U.S. market during the period.

<sup>117</sup> CR/PR at Table 3.1.

<sup>118</sup> CR/PR at Table 3.15.

\*\*\* percent in interim 2025, compared with \*\*\* percent in interim 2024.<sup>119</sup> \*\*\* reported its reasons for importing as \*\*\*.<sup>120</sup>

\*\*\* operating-income-to-net-sales ratio was \*\*\* percent in 2022, \*\*\* percent in 2023, \*\*\* percent in 2024, and \*\*\* percent in interim 2025, compared with \*\*\* percent in interim 2024, which was \*\*\* than the domestic industry's overall operating ratio in \*\*\*, but worse in \*\*\*.<sup>121</sup> \*\*\* made capital expenditures during the POI: \$\*\*\* in 2022; \$\*\*\* in 2023; \$\*\*\* in 2024, and \$\*\*\* in interim 2025, compared with \$\*\*\* in interim 2024.<sup>122</sup>

Since \*\*\* is \*\*\*, and the ratio of its subject imports to its domestic production was relatively low, its primary interest appears to be in domestic production and not in importation of subject merchandise.<sup>123</sup> Moreover, no party has argued that it should be excluded from the domestic industry. Thus, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry.<sup>124</sup>

Accordingly, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry. Therefore, consistent with our definition of the domestic like product, we define a single domestic industry consisting of all producers of temporary steel fencing.

#### **IV. Material Injury by Reason of Subject Imports<sup>125</sup>**

Based on the record in the final phase of this investigation, we find that an industry in the United States is materially injured by reason of imports of temporary steel fencing from

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<sup>119</sup> CR/PR at Table 3.15.

<sup>120</sup> CR/PR at Table 3.16.

<sup>121</sup> CR/PR at Table 6.3.

<sup>122</sup> CR/PR at Table 6.5.

<sup>123</sup> In Commissioner Kearns' view, \*\*\* low ratio of subject imports to domestic production more importantly indicates that \*\*\* inclusion in the domestic industry would not skew industry data in such a way that would mask injury to the industry.

<sup>124</sup> Commissioner Kearns adds that, even if \*\*\* benefited from the \*\*\* percent of total subject imports that it imported during the POI, derived from CR/PR at Tables 3.15 and 4.2, there is no indication that it was shielded from the vast majority of subject imports that entered the U.S. market during the period.

<sup>125</sup> Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible. 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B). In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative), the statute indicates that the negligibility limit is 4 percent rather than 3 percent. 19 U.S.C. § 1677(24)(B). China is not on USTR's list of developing countries for purposes of applicability of the 4 percent negligibility limit. *See Designations* (Continued...)

China that Commerce has found to be sold in the United States at less than fair value and subsidized by the government of China.

#### A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.<sup>126</sup> In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.<sup>127</sup> The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”<sup>128</sup> In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.<sup>129</sup> No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>130</sup>

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,<sup>131</sup> it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.<sup>132</sup> In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price

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*of Developing Countries and Least Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613 (USTR Feb. 10, 2020).

Imports of temporary steel fencing from China accounted for \*\*\* percent of total imports of temporary steel fencing during the period January through December 2024. CR/PR at Table 4.8. Accordingly, we find that imports from China are not negligible.

<sup>126</sup> 19 U.S.C. §§ 1671d(b), 1673d(b).

<sup>127</sup> 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

<sup>128</sup> 19 U.S.C. § 1677(7)(A).

<sup>129</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>130</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>131</sup> 19 U.S.C. §§ 1671d(b), 1673d(b).

<sup>132</sup> *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.<sup>133</sup>

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.<sup>134</sup> In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.<sup>135</sup> Nor does

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<sup>133</sup> The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1381 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” See also *Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

<sup>134</sup> SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); accord *Mittal Steel*, 542 F.3d at 877.

<sup>135</sup> SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); see also *Softwood* (Continued...)

the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.<sup>136</sup> It is clear that the existence of injury caused by other factors does not compel a negative determination.<sup>137</sup>

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”<sup>138</sup> The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”<sup>139</sup> The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”<sup>140</sup>

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

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

<sup>136</sup> S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

<sup>137</sup> *See Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

<sup>138</sup> *Mittal Steel*, 542 F.3d at 876 &78; *see also id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) *citing United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

<sup>139</sup> *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

<sup>140</sup> *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

evidence standard.<sup>141</sup> Congress has delegated this factual finding to the Commission because of the agency's institutional expertise in resolving injury issues.<sup>142</sup>

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

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

### **1. Captive Production.**

In the preliminary determinations, no party argued that the captive production provision applied to these investigations.<sup>143</sup> The Commission found that domestic producers both internally transferred substantial production of the domestic like product and sold significant production of the domestic like product in the merchant market.<sup>144</sup> However, the Commission found that the captive production provision of the statute did not apply because the threshold condition was not satisfied. It found that there was no information on the record indicating that the production of temporary steel fencing that was internally transferred by certain domestic producers was further processed into a downstream product that was distinct from the domestic like product. Rather, it found that the available information indicated that each vertically integrated firm first produced temporary steel fencing, and then generally transferred the temporary steel fencing to the inventory of the firm's fence rental operations or to a related firm, which it then rented out the same temporary steel fencing to the firm's rental customers, without further processing it into a distinct "downstream article."<sup>145</sup>

The Commission stated that it considered it to be an important condition of competition that a substantial portion of total U.S. shipments by the domestic industry was internally transferred to related firms (or within the same firm).<sup>146</sup>

In the final phase of these investigations, no party argues that the Commission should revisit its findings that the captive production provision does not apply. Accordingly, we continue to find that the captive production provision does not apply.

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<sup>141</sup> We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

<sup>142</sup> *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 ("The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.").

<sup>143</sup> *Preliminary Determinations*, USITC Pub. 5597 at 26-27.

<sup>144</sup> *Preliminary Determinations*, USITC Pub. 5597 at 27.

<sup>145</sup> *Preliminary Determinations*, USITC Pub. 5597 at 28.

<sup>146</sup> *Preliminary Determinations*, USITC Pub. 5597 at 28.

## 2. Demand Considerations

U.S. demand for temporary steel fencing depends on the demand for its end use applications. Reported end uses for temporary steel fencing include perimeter control for construction sites, event security, dog kennels, and backyard poultry operations.<sup>147</sup> Demand for temporary steel fencing is connected to the demand for site services (including portable restrooms, trailers, and dumpsters), with large site service companies often providing temporary steel fencing offerings.<sup>148</sup> A substantial percentage of temporary steel fencing in the U.S. market is sold to rental companies that rent to the end user for a finite period, after which the product is returned to the rental company's fleet and re-used.<sup>149</sup> Distributors, retailers, and end users, such as construction companies, venues and arenas, and special events companies, also purchase temporary steel fencing.<sup>150</sup>

Firms reported that U.S. demand for temporary steel fencing is driven by fluctuations in construction, and follows the seasonality of the construction industry, and as such it is higher during the spring and summer months.<sup>151</sup>

Four of seven responding U.S. producers reported a decline in U.S. demand for temporary steel fencing during the POI, while a plurality of importers (seven of 15) reported an increase in U.S. demand, although several importers reported a decline in demand. The majority of purchasers reported no change in U.S. demand, but several reported that demand fluctuated upward during the POI.<sup>152</sup> Sonco argues that U.S. demand increased and reached its peak during the POI in 2022 as COVID-19 pandemic restrictions were eased and there were new entrants in the fence rental business.<sup>153</sup>

Apparent U.S. consumption of temporary steel fencing declined by \*\*\* percent from 2022 to 2024, falling from \*\*\* pounds in 2022 to \*\*\* pounds in 2023 and \*\*\* pounds in 2024;

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<sup>147</sup> CR/PR at 2.8.

<sup>148</sup> CR/PR at 2.10.

<sup>149</sup> CR/PR at 2.1. In 2024, \*\*\* percent of U.S. producers' U.S. shipments of other temporary steel fencing went to rental companies, but \*\*\* of U.S. producers' shipments of animal kennels went to rental companies. *Id.* at Table 1.6. In 2024, \*\*\* percent of U.S. shipments of subject imports of other temporary steel fencing went to rental companies, while \*\*\* of U.S. shipments of subject imports of animal kennels went to rental companies. CR/PR at Tables G.1, G.4.

<sup>150</sup> CR/PR at 2.1.

<sup>151</sup> CR/PR at 2.9, 2.10.

<sup>152</sup> CR/PR at Table 2.8.

<sup>153</sup> Sonco's Prehearing Brief at 18-19. In the Preliminary Determinations, the Commission stated that "{b}oth petitioner and respondent SONCO agree that U.S. demand increased in 2021 and 2022 as the United States emerged from the COVID-19 pandemic, construction activity increased, and festivals and other events resumed." *Preliminary Determinations*, USITC Pub. 5597 at 29.

it was \*\*\* percent higher in interim 2025, at \*\*\* pounds, compared with \*\*\* pounds in interim 2024.<sup>154</sup>

### 3. Supply Considerations

The domestic industry accounted for the largest share of apparent U.S. consumption during the POI, followed by subject imports, and then nonsubject imports.

Of the eight U.S. producers that responded to the Commission's questionnaire, the largest producers in 2024 were \*\*\*, accounting for \*\*\* percent of U.S. production, followed by \*\*\* (\*\*% percent), and \*\*\*, (\*\*% percent).<sup>155</sup> During the POI, ZND started production at its Madera, California, facility in 2022, while Behlen closed its factory in Omaha, Nebraska, in 2023, and \*\*\*.<sup>156</sup>

Of the seven responding U.S. producers providing usable financial data,<sup>157</sup> \*\*\* firms reported commercial shipments (\*\*%), and \*\*\* firms reported internal consumption or transfers to related firms (\*\*%).<sup>158</sup> The reported internal consumption and transfers to related firms by these U.S. producers were for downstream rental operations, not further processing into a distinct downstream product.<sup>159</sup> In 2024, \*\*\* percent of the domestic industry's net sales quantity were commercial sales, \*\*\* percent were internal consumption, and \*\*\* percent were transfers to related firms.<sup>160</sup>

\*\*\* U.S. producers reported producing other temporary steel fencing (*i.e.*, perimeter fencing) (ZND, Stephens Pipe, \*\*\*), while \*\*\* firms reported producing animal enclosures (Stephens Pipe, \*\*\*), with \*\*\* firms reported producing both types of temporary fencing (Stephens Pipe, \*\*\*).<sup>161</sup> In 2024, \*\*\* percent of the domestic industry's production was of animal enclosures, while \*\*\* percent of production was of other temporary steel fencing.<sup>162</sup>

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<sup>154</sup> CR/PR at Tables 4.13, C.1.

<sup>155</sup> CR/PR at Table 3.1.

<sup>156</sup> CR/PR at Tables 3.3, 3.4.

<sup>157</sup> U.S. producer \*\*\* provided incomplete financial data that were not usable. CR/PR at 6.1 n.2.

<sup>158</sup> CR/PR at 6.1. \*\*\* reported relatively minor amounts of U.S. commercial shipments (\*\*% percent of the firm's total U.S. shipments in 2024). \*\*\* U.S. Producer Questionnaire Response at II-8 and II-12 (EDIS Document No. \*\*\*).

<sup>159</sup> CR/PR at 3.11; *see Preliminary Determinations*, USITC Pub. 5597 at 28.

<sup>160</sup> CR/PR at 6.1.

<sup>161</sup> CR/PR at Table 3.1.

<sup>162</sup> CR/PR at Table 3.8.

U.S. producer ZND produces only wire mesh panels,<sup>163</sup> while other U.S. producers, including Stephens Pipe, produce only chain link panels.<sup>164</sup> In 2024, \*\*\* percent of U.S. producers' U.S. shipments had a chain link interior, while \*\*\* percent had a wire mesh interior.<sup>165</sup> Sonco argues that the domestic industry has limited capacity to supply the U.S. market with chain link perimeter fencing, given that \*\*\* U.S. producers of chain link fencing (\*\*\*) internally transfer their production to their fence rental operations, leaving Stephens Pipe as the sole domestic supplier of chain link perimeter fencing to the U.S. commercial market.<sup>166</sup>

The domestic industry's practical capacity increased irregularly by 12.8 percent from 2022 to 2024, rising from 124.7 million pounds in 2022 to 144.6 million pounds in 2023, and then falling to 140.6 million pounds in 2024; practical capacity was 0.4 percent higher in interim 2025, at 71.4 million pounds, compared with 71.1 million pounds in interim 2024.<sup>167</sup> The increase in the domestic industry's capacity in 2023 was due to \*\*\*.<sup>168</sup> By contrast, \*\*\* reduced its capacity from \*\*\* pounds in 2022 to \*\*\* pounds in 2023, and \*\*\* pounds in 2024.<sup>169</sup>

The industry's capacity utilization declined by 18.8 percentage points from 2022 to 2024, falling from 56.3 percent in 2022 to 39.5 percent in 2023 and 37.5 percent in 2024; capacity utilization was 2.4 percentage points higher in interim 2025, at 42.0 percent, compared with 39.6 percent in interim 2024.<sup>170</sup>

A majority of the production by the domestic industry on the same machinery used to produce temporary steel fencing during the POI was of out-of-scope products. In 2024, 64.3 percent of the production on the equipment used to produce temporary steel fencing was production of out-of-scope products, while 35.7 percent was production of temporary steel fencing.<sup>171</sup>

No U.S. producer reported supply constraints during the POI. Four importers reported that supply constraints occurred during 2022, one reported that constraints occurred in 2023,

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<sup>163</sup> Hearing Tr. at 25 (Walters).

<sup>164</sup> Hearing Tr. at 129-32 (Cochran).

<sup>165</sup> CR/PR at Table 3.11. The percentage of U.S. producers' U.S. shipments with a mesh interior increased irregularly from 2022 to 2024, falling from \*\*\* percent in 2022 to \*\*\* percent in 2023, and then increasing to \*\*\* percent in 2024; it was higher in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024. *Id.*

<sup>166</sup> Sonco's Prehearing Brief at 20-22.

<sup>167</sup> CR/PR at Tables 3.7, C.1.

<sup>168</sup> CR/PR at 3.7 n.3.

<sup>169</sup> CR/PR at Table 3.7.

<sup>170</sup> CR/PR at Tables 3.7, C.1.

<sup>171</sup> CR/PR at Table 3.8. These out-of-scope products included \*\*\*. *Id.* at 3.10.

and two reported that they occurred in 2025.<sup>172</sup> Constraints reported by importers included limited ocean shipping container availability and high costs of ocean transport, making it impractical to transport certain types of panel fencing.<sup>173</sup> Two responding purchasers reported experiencing supply constraints from domestic producers in 2023, 2024, and 2025, and from foreign producers or importers in 2022 and 2025. Reported constraints experienced with respect to domestic producers were shipping issues and capacity constraints on certain products, leading to delays in receiving orders.<sup>174</sup> Sonco argues that supply constraints and disruptions for importers in 2022 led to supply scarcity in the U.S. market in 2022 at a time of growing U.S. demand.<sup>175</sup>

The domestic industry's share of apparent U.S. consumption declined by \*\*\* percentage points from 2022 to 2024, falling from \*\*\* percent in 2022 to \*\*\* percent in 2023, and \*\*\* percent in 2024; its market share was \*\*\* percentage points higher in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>176</sup>

Subject imports as a share of apparent U.S. consumption increased by \*\*\* percentage points from 2022 to 2024, rising from \*\*\* percent in 2022 to \*\*\* percent in 2023, and \*\*\* percent in 2024; their market share was \*\*\* percentage points lower in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>177</sup>

Nonsubject imports as a share of apparent U.S. consumption increased by \*\*\* percentage points from 2022 to 2024, rising from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024; their market share was \*\*\* percentage points higher in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>178</sup> Sources of nonsubject imports include Canada, Cambodia, Mexico, and Vietnam.<sup>179</sup>

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<sup>172</sup> CR/PR at 2.7, Table 2.7.

<sup>173</sup> CR/PR at 2.7.

<sup>174</sup> CR/PR at 2.8, Table 2.7.

<sup>175</sup> Sonco's Posthearing Brief at 5-6.

<sup>176</sup> CR/PR at Tables 4.13, C.1.

<sup>177</sup> CR/PR at Tables 4.13, C.1. U.S. purchaser \*\*\* purchased substantial volumes of subject imports of \*\*\* from U.S. importer \*\*\* during the POI beginning in \*\*\*. \*\*\* Purchaser Questionnaire Response at II-1b, II-3(a), II-6 (EDIS Document No. 873763); *see also* \*\*\* U.S. Importer Questionnaire Response at II-6a, III-20, III-21, III-25 (EDIS Document No. \*\*\*). \*\*\* reported that its supplier \*\*\*. \*\*\* Purchaser Questionnaire Response at II-3(c). \*\*\* reported that it sources from \*\*\* in China. \*\*\* U.S. Importer Questionnaire Response at II-6a n.1, III-20, III-21.

<sup>178</sup> CR/PR at Tables 4.13, C.1.

<sup>179</sup> CR/PR at 2.7. U.S. importer \*\*\* reported importing substantial volumes of nonsubject imports of \*\*\* from \*\*\* during the POI beginning in \*\*\*. \*\*\* U.S. Importer Questionnaire Response at II-8a (EDIS Document No. \*\*\*). According to the \*\*\*. Petitioner's Posthearing Brief at Exh. 37 (affidavit of Marcel Van Kesteren) at Paragraph 5. \*\*\* imports of temporary steel fencing, all from \*\*\* during the (Continued...)

#### 4. Substitutability and Other Conditions

We find that there is a moderate degree of substitutability between subject imports and the domestic like product.<sup>180</sup> To reach this conclusion, we examined the questionnaire responses as to the degree of interchangeability of subject imports and the domestic like product and how subject imports and the domestic like product compare across purchasing factors. Additionally, in view of Sonco's arguments that substitutability is limited due to the domestic industry's alleged concentration in wire mesh panels while subject imports are primarily of chain link panels,<sup>181</sup> we also considered the interchangeability of wire mesh and chain link fencing and the relative shares of U.S. shipments of each by U.S. producers and U.S. importers.<sup>182</sup>

Majorities of responding U.S. producers and importers reported that subject imports and the domestic like product are always or frequently interchangeable, while all responding U.S. purchasers reported that subject imports and the domestic like product are only sometimes interchangeable.<sup>183</sup> Majorities of responding purchasers reported that the domestically produced product was comparable to subject imports with respect to nine of 21 factors.<sup>184</sup> For the other purchasing factors, purchaser responses were mixed, with responding purchasers being evenly divided as to whether the domestic like product was comparable to or

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POI, increased from \*\*\* in 2022 to \*\*\* pounds in 2023 and \*\*\* pounds in 2024; they were higher in interim 2025, at \*\*\* pounds, than in interim 2024, at \*\*\* pounds. \*\*\* U.S. Importer Questionnaire Response at II-8a. As all these imports were \*\*\* were a significant contributor to the increase in nonsubject imports' share of apparent U.S. consumption over the POI. Compare \*\*\* U.S. Importer Questionnaire Response at II-8a with CR/PR at Table 4.13 (showing that U.S. shipments of nonsubject imports increased from \*\*\* pounds in 2022 to \*\*\* pounds in 2023 and \*\*\* pounds in 2024; they were higher in interim 2025, at \*\*\* pounds, than in interim 2024, at \*\*\* pounds).

<sup>180</sup> See CR/PR at 2.12.

<sup>181</sup> See Sonco's Posthearing brief, Response to Commissioner Questions, at A.13-A.14.

<sup>182</sup> Chair Karpel observes, with respect to Sonco's arguments that an alleged concentration of the domestic industry on wire mesh panels limits substitutability, that although most importers and purchasers and half of U.S. producers consider wire mesh and chain link panels to be only sometimes or never interchangeable, the record shows that there are substantial U.S. shipments of both chain link and wire mesh temporary steel fencing from both U.S. producers and subject importers. CR/PR at Tables 2.19, 3.11, 4.6. Chair Karpel finds that this further supports the conclusion that taken as whole the record supports a finding of a moderate degree of substitutability.

<sup>183</sup> CR/PR at Table 2.18. We note that the Commission received responses from only three purchasers to this question. *Id.*

<sup>184</sup> The nine factors were price, safety requirements, discounts offered, payment terms, ease of loading and unloading, packaging, U.S. transportation costs, minimum quantity requirements, and technical support/service. CR/PR at Table 2.17.

inferior to subject imports with respect to seven factors,<sup>185</sup> a majority of responding purchasers reporting that the domestic like product was inferior to subject imports with respect to four factors (availability, compatibility with existing fleet, product range, and ability to repair) and a plurality of responding purchasers reporting the domestic like product was superior to subject imports with respect to one factor (delivery time).<sup>186</sup> We consider these data broadly supportive of a finding of moderate substitutability.

The parties' arguments regarding substitutability largely center on alleged differences between and preferences for temporary steel fencing made of chain link panels versus temporary steel fencing made of wire mesh panels. Sonco argues that a factor limiting substitutability between subject imports and the domestic like product is the large percentage of U.S. producers' shipments consisting of wire mesh panels, while the majority of subject imports consist of chain link panels. It contends that chain link panels are the "industry standard" in the United States, particularly with respect to fence rental companies. Sonco argues that fence rental purchasers prefer chain link panels because of their greater durability and repairability, and that purchasers value "fleet compatibility," using panels of all the same kind on a project, rather than mixing and matching chain link and wire mesh panels. Sonco asserts that wire mesh panels are prone to breaking, particularly when being handled and moved, and are more difficult and costly to repair, and that transporting wire mesh and chain link panels together provides additional risk of damage.<sup>187</sup> Sonco acknowledges that, as a distributor, it sells both chain link and wire mesh panels, and contends that some of its customers prefer wire mesh panels for aesthetic reasons where durability is less of a concern.<sup>188</sup>

Petitioner, however, argues that chain link and wire mesh panels are interchangeable and substitutable, and compete head-to-head for sales. It asserts that purchasers are "agnostic" as to the merits of the two panel types, and make their purchasing decisions as to panel type on the basis of price, disputing Sonco's claim that purchasers choosing wire mesh

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<sup>185</sup> The seven factors were product consistency, reliability of supply, fence type, quality meets industry standards, durability, delivery terms, and quality meets industry standards. CR/PR at Table 2.17.

<sup>186</sup> CR/PR at Table 2.13. We note that the Commission received responses from only four purchasers for almost all of these comparisons (five purchasers reported with respect to the comparison of U.S. transportation costs). *Id.*

<sup>187</sup> Sonco's Prehearing Brief at 23-26; Sonco's Posthearing Brief at A.1-A.3, A.13-A.16, A.26-A.27, A.35-36.

<sup>188</sup> Hearing Tr. at 116-17, 190-91 (Greer). Respondent witnesses from Rent-a-Fence and Stephens Pipe similarly testified about carrying a small percentage of wire mesh panels that some customers prefer for aesthetic reasons. *Id.* at 126 (Orthey); 132 (Cochran).

panels do so because of aesthetics.<sup>189</sup> Petitioner disputes Sonco's contention that wire mesh panels are less durable and less easy to repair than chain link panels, contending that Sonco's endorsement in its marketing materials of the quality and durability of ZND's panels refutes Sonco's assertions in this proceeding.<sup>190</sup> Petitioner contends that wire mesh and chain link fencing are frequently used on the same projects, as corroborated by various photographs of temporary fencing.<sup>191</sup> Petitioner argues that the acceptance of wire mesh panels by U.S. purchasers has been growing substantially over the POI, with respect to both the domestic like product and subject imports, and with respect to both perimeter fencing and animal enclosures.<sup>192</sup>

A majority of U.S. shipments of both the domestic like product and subject imports contained link interiors, while substantial quantities from both sources contained mesh interiors. The share of U.S. producers' U.S. shipments with link interiors ranged between \*\*\* percent and \*\*\* percent during the full years of the POI, while the share with mesh interiors ranged between \*\*\* percent and \*\*\* percent.<sup>193</sup> The share of U.S. shipments of subject imports with link interiors ranged between \*\*\* percent and \*\*\* percent during the full years of the POI, while the share with mesh interiors ranged between \*\*\* percent and \*\*\* percent.<sup>194</sup> Thus, the record indicates that there is not a clear difference between subject imports and the domestic industry with respect to the type of fence they sell, with both sources selling a majority of chain link panels and a substantial quantity of wire mesh panels.

Moreover, Sonco's substitutability argument relies heavily on its assertions that fence rental companies prefer chain link panels, but fence rental companies accounted for a \*\*\* (\*\*\*) percent) of U.S. producers' U.S. shipments of temporary steel fencing in 2024.<sup>195</sup> Substantial quantities of domestically produced temporary steel fencing went to the three other channels of distribution (distributors, end users, and retailers) in which purchasers did not necessarily prefer chain link panels.<sup>196 197</sup>

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<sup>189</sup> Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 24-27, 29.

<sup>190</sup> Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 28-32.

<sup>191</sup> Petitioner's Prehearing Brief at 6 and Exh.1.

<sup>192</sup> Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 32-34.

<sup>193</sup> CR/PR at Table 3.11.

<sup>194</sup> CR/PR at Table 4.6.

<sup>195</sup> CR/PR at Table 2.4.

<sup>196</sup> CR/PR at Table 2.4.

<sup>197</sup> In addition, we note that \*\*\* exclusively used wire mesh panels for its perimeter fencing rental business, demonstrating that at least one firm in the rental space found wire mesh panels suitable. \*\*\* U.S. Importer Questionnaire Response at II-8a-8d (EDIS Document No. \*\*\*); \*\*\* U.S. Purchaser Questionnaire Response at II-1b, II-6, III-5(a) (EDIS Document No. 873763); \*\*\* U.S. Importer Questionnaire Response at II-6a-6d, III-20(b), III-21 (EDIS Document No. \*\*\*).

Three responding U.S. producers reported that wire mesh and chain link panels are always or frequently interchangeable, whereas the remaining three responding U.S. producers reported that wire mesh and chain link panels are sometimes interchangeable.<sup>198</sup> Three responding U.S. importers reported that wire mesh and chain link panels are always or frequently interchangeable, whereas six reported that wire mesh and chain link panels are only sometimes interchangeable, and an additional three reported that wire mesh and chain link panels are never interchangeable.<sup>199</sup> Pluralities of responding U.S. producers (three of six producers) and importers (six of 12 importers) reported that wire mesh and chain link panels are sometimes interchangeable.<sup>200</sup> All three responding purchasers reported that wire mesh and chain link panels are never or only sometimes interchangeable.<sup>201</sup> Eight of ten responding purchasers reported that fence type (chain link or mesh) was a very important purchasing factor, while seven purchasers reported that durability was a very important factor, and five purchasers reported that compatibility with existing fleet was a very important factor.<sup>202</sup> Purchasers were split as to the importance of repairability, with four purchasers reporting that it was very important, two that it was somewhat important, and four that it was not important.<sup>203</sup>

Responding purchasers were evenly split (two-two in each case) between reporting that the domestic like product and subject imports were comparable with respect to fence type and durability, and reporting that the domestic like product was inferior to subject imports with respect to these two factors.<sup>204</sup> By contrast, majorities of responding purchasers (three to one in each case) reported that the domestic like product was inferior to subject imports with respect to compatibility with existing fleet and ability to repair.<sup>205</sup>

In sum, while we acknowledge that the domestic industry is more concentrated in sales of wire mesh than subject imports, and additionally acknowledge that certain purchasers have indicated preferences for one product type over another along the lines argued by Sonco in its

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<sup>198</sup> CR/PR at Table 2.19.

<sup>199</sup> CR/PR at Table 2.19.

<sup>200</sup> CR/PR at Table 2.19. Three of six responding U.S. producers and three of 12 responding U.S. importers reported that chain link and wire mesh panels are frequently or always interchangeable, with three importers responding that they are never interchangeable. *Id.*

<sup>201</sup> CR/PR at Table 2.12.

<sup>202</sup> CR/PR at Table 2.13.

<sup>203</sup> CR/PR at Table 2.13. Three of ten responding purchasers reported the ability to repair chain link panels, but only at a high cost, while all ten purchasers reported that they did not have the ability to repair wire mesh panels. CR/PR at 2.15, Table 2.14.

<sup>204</sup> CR/PR at Table 2.17.

<sup>205</sup> CR/PR at Table 2.17.

claims, our finding of a moderate degree of substitutability accounts for these issues while also reflecting the broader record including evidence that both the domestic industry and subject imports produce and sell both chain and wire mesh in significant quantities and for many U.S. purchasers there is substantial interchangeability between chain link and wire mesh product.

We have also considered the importance of price in purchasing decisions. The most often cited factors that responding purchasers reported they consider as among their top three factors in purchasing decisions for temporary steel fencing were quality (seven firms), price/cost (five firms), compliance/technical specs/patent (four firms), and availability/supply (four firms).<sup>206</sup> Compliance/technical specs/patent was most frequently cited as the first-most important factor (cited by four firms), while availability/supply was most frequently cited as the second-most important factor (cited by three firms), and price/cost and quality were most frequently cited as the third-most important factor (cited by three firms each).<sup>207</sup>

Responding purchasers were also asked to rate the importance of various factors in their purchasing decisions for temporary steel fencing. The factors rated as very important by more than half of responding purchasers were product consistency (nine firms), availability (eight firms), quality meets industry standards (eight firms), reliability of supply (eight firms), fence type (eight firms), durability (seven firms), delivery times (five firms), compatibility with existing fleet (five firms), and price (five firms).<sup>208</sup> Further, a majority of responding U.S. producers reported that differences other than price between subject imports and the domestic like product were only sometimes or never important in sales of temporary steel fencing, while a majority of responding U.S. importers reported that differences other than price were always or frequently important in sales of temporary steel fencing, and all responding U.S. purchasers reported that differences other than price were always or frequently important in purchases of temporary steel fencing.<sup>209</sup> Based on the foregoing, we find that price is an important factor in purchasing decisions for temporary fencing, along with other factors.

U.S. producers reported that 52.9 percent of their U.S. commercial shipments were sold from inventories in 2024, with lead times averaging 13 days, while 47.1 percent were produced to order, with lead times averaging 16 days. Importers reported that 24.1 percent of their U.S.

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<sup>206</sup> CR/PR at Table 2.19.

<sup>207</sup> CR/PR at Table 2.12.

<sup>208</sup> CR/PR at Table 2.13; *see also* Hearing Tr. at 184, 187 (Cochran) (witness from domestic producer Stephens Pipe testifying that most of its customers “shop around” for prices and that some customers “try to haggle you”).

<sup>209</sup> CR/PR at Table 2.20. We note that the Commission received responses from only three purchasers to this question. *Id.*

commercial shipments were produced to order in 2024, with lead times averaging 90 days, 46.7 percent were sold from U.S. inventories with lead times averaging 4 days, and 29.2 percent were sold from foreign inventories, with an average lead time of 111 days.<sup>210</sup>

Both subject imports and the domestic like product were sold primarily on the spot market in 2024.<sup>211</sup> U.S. producers reported that 100.0 percent of their U.S. commercial shipments were spot sales, while U.S. importers reported that 61.0 percent of their U.S. commercial shipments were spot sales, 22.5 percent were through annual contracts, 12.4 percent were through short-term contracts, and 4.1 percent were through long-term contracts.<sup>212</sup>

Most responding U.S. producers (five of six) and importers (13 of 16) reported that they typically arrange transportation to their customers.<sup>213</sup> Most U.S. producers reported that their inland U.S. transportation costs ranged from \*\*\* percent to \*\*\* percent, while most importers reported costs ranging from \*\*\* percent to \*\*\* percent.<sup>214</sup>

Raw material costs accounted for by far the largest share of the domestic industry's total cost of goods sold ("COGS") throughout the POI, ranging from \*\*\* percent to \*\*\* percent of COGS.<sup>215</sup> The major raw materials used to produce panels include steel pipe and tubing for the outer frame and steel wire for the interior, while stands are also produced from steel tubing.<sup>216</sup> Overall, prices for steel pipe and tube decreased by 22.4 percent during January 2022 to June 2025, while prices for steel wire decreased by 6.1 percent during the same period.<sup>217</sup>

Temporary steel fencing originating in China is subject to an additional 50 percent *ad valorem* duty under section 232 of the Trade Expansion Act of 1962, as amended.<sup>218</sup> Effective August 23, 2018, temporary steel fencing originating in China is subject to an additional 25 percent *ad valorem* duty under section 301 of the Trade Act of 1974.<sup>219</sup> Effective February 4, 2025, temporary steel fencing originating in China was subject to varying levels of duties under

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<sup>210</sup> CR/PR at 2.16.

<sup>211</sup> CR/PR at Table 5.4.

<sup>212</sup> CR/PR at Table 5.4.

<sup>213</sup> CR/PR at 5.4

<sup>214</sup> CR/PR at 5.4.

<sup>215</sup> CR/PR at 6.17. The domestic industry's raw material costs as a percentage of its total COGS were \*\*\* percent in 2022, \*\*\* percent in 2023, and \*\*\* percent in 2024; they were lower in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024. *Id.* at Table 6.1.

<sup>216</sup> CR/PR at 5.1, 6.17, Table 6.1.

<sup>217</sup> Derived from CR/PR at Tables 5.1, 5.2.

<sup>218</sup> CR/PR at 1.12.

<sup>219</sup> CR/PR at 1.12.

the International Emergency Economic Powers Act (“IEEPA”). It was announced on February 20, 2026, that duties imposed under IEEPA were no longer in effect.<sup>220</sup> Temporary steel fencing originating in China is not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974.<sup>221</sup>

### **C. Volume of Subject Imports**

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”<sup>222</sup>

The volume of subject imports increased irregularly by 6.3 percent from 2022 to 2024, declining from 38.4 million pounds in 2022 to 33.7 million pounds in 2023, and then increasing to 40.8 million pounds in 2024; it was 3.3 percent higher in interim 2025, at 21.5 million pounds, compared with 20.8 million pounds in interim 2024.<sup>223</sup>

The market share of subject imports increased by \*\*\* percentage points from 2022 to 2024, rising from \*\*\* percent in 2022 to \*\*\* percent in 2023, and \*\*\* percent in 2024; their market share was \*\*\* percentage points lower in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>224</sup> Subject imports gained \*\*\* percentage points of market share at the expense of the domestic industry, which lost \*\*\* percentage points of market share between 2022 and 2024.<sup>225</sup>

We find that the volume of subject imports and the increase in that volume are significant in absolute terms and relative to consumption in the United States.

### **D. Price Effects of the Subject Imports**

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

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<sup>220</sup> CR/PR at 1.13-1.14.

<sup>221</sup> CR/PR at 1.13.

<sup>222</sup> 19 U.S.C. § 1677(7)(C)(i).

<sup>223</sup> CR/PR at Tables 4.2, 4.3.

<sup>224</sup> CR/PR at Tables 4.13, C.1.

<sup>225</sup> CR/PR at Tables 4.13, C.1. As a ratio to U.S. production, subject imports increased from 54.7 percent in 2022 to 59.1 percent in 2023 and 77.5 percent in 2024; the ratio was lower in interim 2025, at 71.6 percent, compared with 73.8 percent in interim 2024. CR/PR at Table 4.2.

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

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.<sup>226</sup>

As discussed in section IV.B.4 above, we find that there is a moderate degree of substitutability between subject imports and the domestic like product, and that price is an important factor in purchasing decisions for temporary steel fencing, along with other factors.

The Commission collected quarterly quantity and f.o.b. pricing data on sales of seven temporary steel fencing products shipped to unrelated U.S. customers during the POI.<sup>227</sup> Three

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<sup>226</sup> 19 U.S.C. § 1677(7)(C)(ii).

<sup>227</sup> CR/PR at 5.6. The seven pricing products are:

**Product 1.**-- Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.

**Product 2.**-- Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.

**Product 3.**-- Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

**Product 4.**-- Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

**Product 5.**-- Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, sold to fence rental companies.

**Product 6.**-- Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, sold to distributors.

**Product 7.**-- Temporary steel fencing that is designed to establish a free-standing enclosure for animals, galvanized, not powder coated, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced). Typically sold as kits that contain at least four fence panels. Each kit includes a panel with hinges or a hinged door, is sold as a single unit, and intended to be assembled by the consumer. *Id.* at 5.6 to 5.7.

U.S. producers and six importers provided usable pricing data for sales of the requested products, although not all firms reported pricing data for all products for all quarters.<sup>228</sup> The reported pricing data accounted for approximately \*\*\* percent of U.S. producers' U.S. commercial shipments of temporary steel fencing (by value) in 2024, and \*\*\* percent of U.S. shipments of subject imports (by value) from China.<sup>229</sup>

In addition, the Commission requested that firms that imported three specified products from China for rental use provide import purchase cost data.<sup>230</sup>

The Commission received no usable pricing data for subject imports of products 1 and 3, and no usable pricing data for domestically produced products 2 and 4.<sup>231</sup> It also received no usable purchase cost data with respect to purchases of subject imports of product 8.<sup>232</sup> Thus, although the Commission received pricing data for both subject imports and the domestic industry for products 5 and 6 (fence tube stands) and 7 (animal kennels), it did not receive data for perimeter fence panels (products 1-4) that would permit it to compare prices of subject imports and the domestic like product for these pricing products.<sup>233</sup> We note that missing from our pricing data is any pricing data from Stephens Pipe, which produces chain link temporary

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<sup>228</sup> CR/PR at 5.7.

<sup>229</sup> CR/PR at 5.7. We note that, as previously discussed, several U.S. producers of chain link panels (\*\*\*) reported \*\*\*, and thus reported \*\*\*. CR/PR at Table 3.11.

<sup>230</sup> Firms that imported the following products from China for rental use were requested to provide import purchase cost data (for product equivalents of pricing product 1, pricing product 2, and pricing product 5).

**Product 8.--** Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, imported by your firm for rental use.

**Product 9.--** Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, imported by your firm for rental use.

**Product 10.--** Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, imported by your firm for rental use. *Id.* at 5.22.

<sup>231</sup> CR/PR at Table 5.14.

<sup>232</sup> CR/PR at 5.22.

<sup>233</sup> We note that, as in the preliminary phase of the investigations integrated producers \*\*\*, which produce \*\*\*, did not report pricing data because they do not sell to unrelated customers in the commercial market, with the exception of \*\*\*, which reported small quantities of U.S. shipments of \*\*\*. CR/PR at 3.11; \*\*\* U.S. Producer Questionnaire Response at II-8 through II-12 (EDIS Document No. \*\*\*).

Moreover, respondent importer DSS, which imports welded wire mesh panels from China that are powder coated, \*\*\* pricing data, reporting that \*\*\*. Hearing Tr. at 103-04 (Ivy); Preliminary Phase U.S. Importer Questionnaire -- Follow up to Part III with DSS (EDIS Document No. 843424).

steel fencing and accounted for \*\*\* percent of U.S. production of temporary steel fencing in 2024.<sup>234</sup>

We have considered the price comparisons with respect to products 5, 6, and 7 reflected in Part 5 of the Commission report. Based on these data, subject imports undersold the domestic like product in 29 of 32 quarterly comparisons, covering \$\*\*\* in subject imports by value (\*\*\* percent), at margins of underselling ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent.<sup>235</sup> Subject imports oversold the domestic like product in the remaining 3 quarterly comparisons, covering \$\*\*\* in subject imports by value (\*\*\* percent), at margins of overselling ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent.<sup>236</sup>

We have also considered price comparisons reflected in Appendix K of the Commission report for product 1 (fence panels with a welded wire mesh interior sold to fence rental companies) compared with subject import prices for product 2 (fence panels with a chain link interior sold to fence rental companies), as well as U.S. producers' prices for product 3 (fence panels with a welded wire mesh interior sold to distributors) compared with subject import prices for product 4 (fence panels with a chain link interior sold to distributors).<sup>237</sup> Products 1 and 3 represent a significant volume of commercial shipments of the domestic like product, and product 2 similarly represents a significant volume of U.S. commercial shipments of the subject merchandise.<sup>238</sup> In addition, the volume of U.S. shipments of perimeter fencing panels was far

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<sup>234</sup> CR/PR at Tabel 3.1. Stephens Pipe, which produces chain link panels and appeared with the respondent panel at the Commission hearing, did not report any pricing data. Stephens Pipe U.S. Producer Questionnaire Response at IV-2d (EDIS Document No. 864512) (“\*\*\*”). Stephens Pipe explained that it “do{es} not track sales according to specific end-user types (*i.e.*, sales to rental companies or sales to distributors)” and thus could not “identify sales broken out for Pricing Products 2 and 4.” Sonco’s Posthearing Brief, Exh. 2 (declaration of Robyn Cochran of Stephens Pipe at Paragraph 5. Stephens Pipe also explained that “many of {its} customers are fence contractors {, and as} these contractors are end users, rather than rental companies or distributors, these sales of temporary fencing do not fall under the Pricing Production definitions.” *Id.*, Exh. 2 at Paragraph 6. Stephens Pipe further reported that it “do{es} not track the sales data in a manner that allows for the quarterly reporting as requested by the Commission.” *Id.*, Exh. 2 at Paragraph 8.

<sup>235</sup> CR/PR at Table 5.17.

<sup>236</sup> CR/PR at Table 5.17.

<sup>237</sup> We note that in the preliminary phase of the investigations, the Commission compared pricing data for the domestic like product and subject imports with respect to pricing products encompassing both chain link and wire mesh panels together for its underselling analysis: product 1 (temporary fence chain link or wire mesh panels sold to fence rental companies) and product 2 (temporary fence chain link or wire mesh panels sold to distributors). *Preliminary Determinations*, USITC Pub. 5597 at 36 n.176.

<sup>238</sup> CR/PR at Table 5.14.

greater throughout the POI than the volume of U.S. shipments of animal enclosures and perimeter fencing stands.<sup>239</sup>

Sonco contends, given its arguments about limited substitutability and interchangeability between wire mesh panels and chain link panels discussed in section IV.B.4 above, that the Commission should not compare prices between the welded mesh panel pricing products and the chain link panel pricing products.<sup>240</sup>

We acknowledge the data reviewed above in section IV.B.4 about the interchangeability of wire mesh and chain link panels; however, the record indicates that ZND, which produces only welded mesh panels, competed directly with importers of subject merchandise, including importers of chain link fencing, during the POI for sales on the basis of price. U.S. distributor \*\*\* reported purchasing \$\*\*\* of lower-priced subject imports from China during the POI rather than domestically produced temporary steel fencing, and confirmed that the lower price of subject imports was the primary reason for the purchase.<sup>241</sup> These lost sales were equivalent to \*\*\* percent of responding purchasers' purchases/imports of subject imports during the POI.<sup>242</sup> ZND provided evidence that \*\*\* had been \*\*\*.<sup>243</sup> At meetings with ZND in \*\*\*. However, given that Chinese prices for temporary steel fencing are sometimes lower than ZND's raw material costs, ZND \*\*\*.<sup>244</sup>

Accordingly, petitioner has presented evidence that producers of wire mesh and chain link panels compete with each other for the same sales and the same projects, with customers considering buying either chain link or wire mesh panels, often depending on price, and that ZND in particular has competed head-to-head for business with subject producers in China on the basis of price.<sup>245</sup> Therefore, we view it as appropriate to compare the prices of the pricing

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<sup>239</sup> U.S. shipments of perimeter fencing panels accounted for \*\*\* percent of total U.S. shipments of temporary steel fencing by volume in 2023, \*\*\* percent in 2024, \*\*\* percent in 2025, \*\*\* percent in interim 2024, and \*\*\* percent in interim 2025, compared with \*\*\* percent in interim 2024. Derived from CR/PR at Tables C.1, F.3, F.13, F.14.

<sup>240</sup> Sonco's Posthearing Brief at A.4. Sonco asserts that if the Commission compares prices for products 1 and 2 (sales to rental companies), it should also compare prices for products 3 and 4 (sales to distributors) reflected in Appendix K of the Commission report. Sonco's Final Comments at 6-7.

<sup>241</sup> CR/PR at Table 5.20. As an importer, \*\*\* reported pricing data for its imports of product 2, chain link fence sold to fence rental companies. \*\*\* U.S. Importer Questionnaire Response at III.2b (EDIS Document No. \*\*\*).

<sup>242</sup> Derived from CR/PR at Tables 5.19, 5.20.

<sup>243</sup> See Petitioner's Posthearing Brief, Response to Commissioner Questions, at 41-42, and Exhs. 35, 39.

<sup>244</sup> Petitioner's Posthearing Brief, Exh. 36, affidavit of Seth Walters, at Paragraphs 5-6.

<sup>245</sup> Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 27, 38-42 and Exhs. 21, 35. We also note that a major reason the record lacks comparisons of subject imports and the (Continued...)

products consisting of welded wire mesh perimeter fencing panels with the corresponding pricing products consisting of chain link perimeter fencing panels, as set out on in Appendix K of the Commission report, including comparisons of the data for products 3 and 4 as Sonco has urged, as well as for products 1 and 2.<sup>246</sup>

Based on the pricing data for perimeter fencing panels comparing prices of domestic wire mesh panels with subject import chain link panels, together with the pricing data for stands and animal enclosure panels,<sup>247</sup> subject imports undersold the domestic industry in 39 of 60 quarterly comparisons with margins of underselling ranging from \*\*\* percent to \*\*\* percent, and an average margin of underselling of \*\*\* percent.<sup>248</sup> Subject imports undersold the domestic like product with respect to \$\*\*\* of subject imports of temporary steel fencing, or \*\*\* percent of the total value of subject imports of temporary steel fencing in the Commission's pricing data.<sup>249</sup> Subject imports oversold the domestic industry in 21 of 60 quarterly comparisons with margins of overselling ranging from \*\*\* percent to \*\*\* percent, and an average margin of overselling of \*\*\* percent. Subject imports oversold the domestic like product with respect to \$\*\*\* of subject imports of temporary steel fencing, or \*\*\* percent

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domestic like product for pricing products 2 and 4 is because Stephens Pipe did not report pricing product data. Stephens Pipe opposes the petitions and a Stephens Pipe witness testified at the hearing as part of respondents' panel. While Stephens Pipe explains its failure to report pricing data as a matter of it not tracking sales by end use, the Stephens Pipe witness testifying at the hearing appeared knowledgeable about the firm's customers. Hearing Tr. at 135 (Cochran).

<sup>246</sup> See Sonco's Final Comments at 6-7. The data in Table K.3 of the Commission report include comparisons of pricing data for products 1 and 2 (fence panels sold to rental companies); products 3 and 4 (fence panels sold to distributors), product 5 (fence stands); product 6 (fence stands), and product 7 (animal kennel panels). The underselling data in Table K.3 for products 5-7 are identical to the data for those products in Table 5.17 of the Commission report.

<sup>247</sup> Based on comparisons of prices for products 1 and 2 and of products 3 and 4, subject imports undersold the domestic like product in 10 of 28 quarterly comparisons, covering \$\*\*\* in subject imports by value (\*\*\* percent), at margins of underselling ranging from \*\*\* percent to \*\*\* percent, and oversold the domestic like product in the remaining 18 quarterly comparisons, covering \$\*\*\* in subject imports by value (\*\*\* percent), at margins of overselling ranging from \*\*\* percent to \*\*\* percent. CR/PR at Table K.3.

As noted above, for products 5-7, subject imports undersold the domestic like product in 29 of 32 quarterly comparisons, covering \$\*\*\* in subject imports by value (\*\*\* percent), at margins of underselling ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent, and oversold the domestic like product in the remaining 3 quarterly comparisons, covering \$\*\*\* in subject imports by value (\*\*\* percent), at margins of overselling ranging from \*\*\* percent to \*\*\* percent and averaging \*\*\* percent. CR/PR at Table 5.17.

<sup>248</sup> CR/PR at Table K.3.

<sup>249</sup> CR/PR at Table K.3. The quantity data for products 1, 2, 3, 4, and 7 (panels) were gathered in linear feet, while the quantity data for products 5 and 6 (stands) were gathered in units, and accordingly the totals are presented by value rather than by quantity.

of the total value of subject imports of temporary steel fencing in the Commission's pricing data.<sup>250</sup>

Furthermore, we note that six purchasers reported that they purchased subject imports instead of the domestic like product and five of these purchasers reported that subject imports were priced lower than the domestic like product.<sup>251 252</sup>

Based on the foregoing, including the moderate degree of substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions for temporary steel fencing, the record information regarding competition between subject imports and the domestic like product based on price including as between ZND's wire mesh panels and subject imports, and subject import underselling, we find that subject imports significantly undersold the domestic like product during the POI. The underselling led to a shift in market share from the domestic industry to subject imports between 2022 and 2024. As

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<sup>250</sup> CR/PR at Table K.3.

<sup>251</sup> CR/PR at 5.36. As noted, one purchaser, \*\*\*, reported that it purchased \$\*\*\* of lower-priced subject imports rather than the domestic like product primarily because of the lower price. *Id.* at Table 5.20. Although the Commission report recorded that six purchasers reported that subject imports were priced lower than the domestic like product, \*\*\* checked \*\*\* when asked whether subject imports were lower priced. \*\*\* U.S. Purchaser Questionnaire at II.3(b) (EDIS Document No. 864183).

<sup>252</sup> Petitioner and Sonco disagree as to whether \*\*\* purchased subject imports instead of the domestic like product based on price. Petitioner's Posthearing Brief, Response to Commissioner Questions at 43; Petitioners' Final Comments at 9; Sonco's Final Comments at 9-10; *see also* Petitioner's Posthearing Brief, Exh. 37 (affidavit of Marcel Van Kesteren); Hearing Tr. at 100-08 (Ivy); Sonco's Posthearing Brief at Exh. 5 (declaration of James Ivy). Petitioner contends that ZND lost sales to subject imports because \*\*\* was based on price. Petitioner's Posthearing Brief at 11 and Response to Commissioner Questions at 43. \*\*\* reported that it purchased subject imports instead of the domestic like product during the POI, but \*\*\* when asked whether subject imports were lower priced, and reported that \*\*\*, stating instead that "\*\*\*\*." \*\*\* U.S. Purchaser Questionnaire at II.3(a)-(c) (EDIS Document No. 864183). Other than noting that \*\*\* offered no additional information about its decision to purchase subject imports instead of the domestic like product. *See generally* \*\*\* U.S. Purchaser Questionnaire (EDIS Document No. 864183). While the \*\*\* claims that a \*\*\* the \*\*\* claims that \*\*\*. Sonco's Posthearing Brief at Exh. 5; Petitioner's Posthearing Brief at Exh. 37. \*\*\*. Petitioner's Posthearing Brief at Exh. 37 (affidavit of Marcel Van Kesteren) at Paragraph 8. Additionally, \*\*\* asserts that \*\*\*. *Id.* at Paragraph 3. Consistent with the pricing data above, \*\*\* U.S. shipment AUVs for panels were significantly lower than ZND's U.S. shipment AUVs for panels in 2023 and 2024, the first two years of \*\*\*. Derived from ZND U.S. Producer Questionnaire Response at II-15 (EDIS Document No. 864188); \*\*\* U.S. Importer Questionnaire Response at II-6d (EDIS Document No. \*\*\*). ZND's U.S. shipments AUV for panels was \$\*\*\* per pound in 2022, \$\*\*\* per pound in 2023, \$\*\*\* per pound in 2024, and \$\*\*\* per pound in interim 2025, while \*\*\* U.S. shipments AUV for panels was \$\*\*\* per pound in 2023, \$\*\*\* per pound in 2024, and \$\*\*\* per pound in interim 2025. *Id.*

previously discussed in section IV.C above, subject imports gained \*\*\* percentage points of market share between 2022 and 2024 at the expense of the domestic industry.<sup>253</sup>

We have also considered whether subject imports depressed or suppressed domestic producer prices during the POI. U.S. producers' prices declined by \*\*\* percent over the POI for product 1, declined by \*\*\* percent for product 3, and increased by \*\*\* percent for product 7. Pricing data from U.S. producers for products 5 and 6 were \*\*\*, but U.S. producers' prices rose by \*\*\* percent from the second quarter of 2023 through the end of the POI for product 5, and rose by \*\*\* percent for product 6.<sup>254</sup> Subject import prices declined over the POI by \*\*\* percent for product 2, increased by \*\*\* percent for product 4, declined by \*\*\* percent for product 5, increased by \*\*\* percent for product 6, and increased by \*\*\* percent for product 7.<sup>255</sup>

The domestic industry's COGS-to-net-sales ratio increased by \*\*\* percentage points between 2022 and 2024, rising from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024; it was \*\*\* percentage points lower in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>256</sup> The industry's COGS-to-net-sales ratio increased between 2022 and 2024 as its unit COGS increased by \$\*\*\* per pound (or \*\*\* percent) to a greater degree than its net sales AUV (\$\*\*\* per pound or \*\*\* percent),<sup>257</sup> and as apparent U.S. consumption declined by \*\*\* percent from 2022 to 2024.<sup>258</sup>

In sum, we find that subject imports significantly undersold the domestic like product, leading to a market share shift from the domestic industry to subject imports of \*\*\* percentage points from 2022 to 2024.

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<sup>253</sup> CR/PR at Tables 4.13, C.1. While the record indicates that the domestic industry recouped \*\*\* percentage points of market share from subject imports in interim 2025 as compared with interim 2024, the domestic industry's market share in interim 2025 remained much lower than its market share at the beginning of the POI. *Id.*

With respect to temporary steel fence panels, the largest product type for each source throughout the POI, *id.* at Tables 3.10, 4.4, 4.5, the domestic industry likewise lost \*\*\* percentage points of market share to subject imports between 2022 and 2024. Derived from *id.* at Tables 3.10, 4.4-4.5.

<sup>254</sup> CR/PR at Tables 5.14, 5.15.

<sup>255</sup> CR/PR at Tables 5.14, 5.16. No purchaser reported that U.S. producers reduced prices in order to compete with lower-priced subject imports. CR/PR at 5.36.

<sup>256</sup> CR/PR at Tables 6.1, C.1. As discussed below, \*\*\*, a financial recording practice distinct from that of the rest of the U.S. producers in the domestic industry. The contrast of the different financial recording practices is particularly visible in the U.S. producers' COGS-to-net-sales ratio. *Id.* at Table 6.3. Accordingly, we acknowledge that the domestic industry's overall COGS-to-net-sales ratio may have been overly influenced by \*\*\* distinct financial reporting.

<sup>257</sup> CR/PR at Tables 6.1, 6.2.

<sup>258</sup> CR/PR at Table C.1.

## E. Impact of the Subject Imports<sup>259</sup>

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission “shall evaluate all relevant economic factors which have a bearing on the state of the industry.”<sup>260</sup> These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>261</sup>

The domestic industry experienced declines between 2022 and 2024 in production, capacity utilization, employment, U.S. shipments, market share, revenues, and gross profits, and also experienced increased end-of-period inventories and increased operating and net losses. The industry saw some improvements between interim 2024 and interim 2025, with higher production, capacity utilization, employment, U.S. shipments, market share, revenues, and gross profit. However, the industry’s productivity in interim 2025 compared to interim 2024 was lower, and its inventories, operating losses, and net losses were higher.

The domestic industry’s practical capacity increased irregularly by 12.8 percent from 2022 to 2024, rising from 124.7 million pounds in 2022 to 144.6 million pounds in 2023, and then falling to 140.6 million pounds in 2024; practical capacity was 0.4 percent higher in interim

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<sup>259</sup> The statute instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination of sales at less value, Commerce found dumping margins of 129.70 percent for forty individual Chinese producers and 184.27 percent for the China-Wide entity. *Temporary Steel Fencing From the People’s Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 91 Fed. Reg. 12577, 12579 (March 16, 2026). We take into account in our analysis the fact that Commerce has made final findings that all subject producers in China are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

<sup>260</sup> 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 (“In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.”).

<sup>261</sup> 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

2025, at 71.4 million pounds, compared with 71.1 million pounds in interim 2024.<sup>262</sup>

Production declined by 24.9 percent from 2022 to 2024, falling from 70.2 million pounds in 2022 to 57.1 million pounds in 2023, and then falling to 52.7 million in 2024; production was 6.6 percent higher in interim 2025, at 30.0 million pounds, compared with 28.1 million pounds in interim 2024.<sup>263</sup> Capacity utilization declined by 18.8 percentage points from 2022 to 2024, falling from 56.3 percent in 2022 to 39.5 percent in 2023 and 37.5 percent in 2024; capacity utilization was 2.4 percentage points higher in interim 2025, at 42.0 percent, compared with 39.6 percent in interim 2024.<sup>264</sup>

U.S. producers' employment indicators declined from 2022 to 2024. The number of production and related workers ("PRWs") declined by 32.3 percent from 2022 to 2024, falling from 223 PRWs in 2022 to 181 PRWs in 2023 and 151 PRWs in 2024; the number of PRWs was 9.7 percent higher in interim 2025, at 170 PRWs, compared with 155 PRWs in interim 2024.<sup>265</sup> Hours worked decreased by 23.5 percent from 2022 to 2024, falling from 332,000 hours in 2022 to 271,000 hours in 2023 and 254,000 hours in 2024; hours worked were 13.4 percent higher in interim 2025, at 152,000 hours, compared with 134,000 hours in interim 2024.<sup>266</sup> Wages paid declined by 27.6 percent from 2022 to 2024, falling from \$7.4 million in 2022 to \$5.7 million in 2023 and \$5.3 million in 2024; wages paid were 27.5 percent higher in interim 2025, at \$3.4 million, compared with \$2.7 million in interim 2024.<sup>267</sup> Productivity declined by 1.9 percent from 2022 to 2024, falling from 211.5 pounds per hour in 2022 to 210.6 pounds per hour in 2023 and 207.6 pounds per hour in 2024; productivity was 6.0 percent lower in interim 2025, at 197.4 pounds per hour, compared with 210.0 pounds per hour in interim 2024.<sup>268</sup>

The domestic industry's end-of-period inventories increased irregularly by \*\*\* percent from 2022 to 2024, falling from \*\*\* pounds in 2022 to \*\*\* pounds in 2023 and \*\*\* pounds in 2024; end of period inventories were \*\*\* percent higher in interim 2025, at \*\*\* pounds, compared with \*\*\* pounds in interim 2024.<sup>269</sup>

The domestic industry's U.S. shipments fell by 32.8 percent from 2022 to 2024, falling from 72.3 million pounds in 2022 to 58.4 million pounds in 2023 and 48.6 million pounds in 2024; U.S. shipments were 10.2 percent higher in interim 2025, at 29.1 million pounds,

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<sup>262</sup> CR/PR at Tables 3.7, C.1.

<sup>263</sup> CR/PR at Tables 3.7, C.1.

<sup>264</sup> CR/PR at Tables 3.7, C.1.

<sup>265</sup> CR/PR at Tables 3.18, C.1.

<sup>266</sup> CR/PR at Tables 3.18, C.1.

<sup>267</sup> CR/PR at Tables 3.18, C.1.

<sup>268</sup> CR/PR at Tables 3.18, C.1.

<sup>269</sup> CR/PR at Tables 3.12, C.1.

compared with 26.5 million pounds in interim 2024.<sup>270</sup> The industry's market share declined by \*\*\* percentage points from 2022 to 2024, falling from \*\*\* percent in 2022 to \*\*\* percent in 2023, and \*\*\* percent in 2024; its market share was \*\*\* percentage points higher in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>271</sup>

The domestic industry's financial indicators declined between 2022 and 2024. Net sales value declined irregularly by \*\*\* percent from 2022 to 2024, falling from \$\*\*\* in 2022 to \$\*\*\* in 2023, and then rising to \$\*\*\* in 2024; net sales value was \*\*\* percent higher in interim 2025, at \$\*\*\*, compared with \$\*\*\* in interim 2024.<sup>272</sup> Gross profits declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2023, and \$\*\*\* in 2024; gross profit was \*\*\* percent higher in interim 2025, at \$\*\*\*, compared with \$\*\*\* in interim 2024.<sup>273</sup> Operating income worsened from \$\*\*\* in 2022 to \$\*\*\* in 2023 and 2024; operating income was worse in interim 2025, at \$\*\*\*, compared with \$\*\*\* in interim 2024.<sup>274</sup> The industry's ratio of operating income to net sales worsened irregularly by \*\*\* percentage points from 2022 to 2024, falling from \*\*\* percent in 2022 to \*\*\* percent in 2023, and then improving \*\*\* to \*\*\* percent in 2024; operating income as a ratio to net sales was \*\*\* percentage points worse in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>275</sup> Net income worsened from \$\*\*\* in 2022 to \$\*\*\* in 2023 and \$\*\*\* in 2024; net income was worse in interim 2025, at \$\*\*\*, compared with \$\*\*\* in interim 2024.<sup>276</sup> The industry's ratio of net income to net sales worsened by \*\*\* percentage points from 2022 to 2024, falling from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024; net income to net sales was \*\*\* percentage points worse in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>277</sup> Net assets declined by \*\*\* percent from 2022 to 2024, falling from \$\*\*\* in 2022 to \$\*\*\* in 2023 and \$\*\*\* in 2024.<sup>278</sup> Return on assets worsened from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024.<sup>279</sup>

The domestic industry's capital expenditures declined irregularly by \*\*\* percent from 2022 to 2024, rising from \$\*\*\* in 2022 to \$\*\*\* in 2023, and then falling to \$\*\*\* in 2024; capital expenditures were \*\*\* percent lower in interim 2025, at \$\*\*\* in interim 2025, compared with

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<sup>270</sup> CR/PR at Tables 3.9, C.1.

<sup>271</sup> CR/PR at Tables 4.13, C.1.

<sup>272</sup> CR/PR at Tables 6.1, C.1.

<sup>273</sup> CR/PR at Tables 6.1, C.1.

<sup>274</sup> CR/PR at Tables 6.1, C.1.

<sup>275</sup> CR/PR at Tables 6.1, C.1.

<sup>276</sup> CR/PR at Tables 6.1, C.1.

<sup>277</sup> CR/PR at Tables 6.1, C.1.

<sup>278</sup> CR/PR at Tables 6.9, C.1.

<sup>279</sup> CR/PR at Table 6.10.

\$\*\*\* in interim 2024.<sup>280</sup> The industry’s research and development expenses were \$\*\*\* in 2022, \$\*\*\* in 2023, and \$\*\*\* in 2024; they were \*\*\* percent lower, at \$\*\*\* in interim 2025, compared with \$\*\*\* in interim 2024.<sup>281 282 283 284</sup>

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<sup>280</sup> CR/PR at Tables 6.5, C-1. U.S. producer \*\*\*, which accounted for \*\*\* share of the domestic industry’s reported capital expenditures in \*\*\*, reported that it \*\*\*. *Id.* at 6.22.

<sup>281</sup> CR/PR at Tables 6.7, C-1.

<sup>282</sup> Sonco argues that the Commission should not rely on the financial data from \*\*\*, contending that because of \*\*\*, its financial data are anomalous and \*\*\*. Sonco’s Posthearing Brief at A.5. We acknowledge that the financial reporting of \*\*\* is not in a format consistent with the financial reporting of the rest of the domestic industry. \*\*\*. CR/PR at 6.19 n.14. However, the record indicates that if we disregarded all of \*\*\* financial data, the financial data for the rest of the domestic industry would indicate the same trend of sharp declines in financial performance during the POI, albeit without operating or net losses. Revenues for the domestic industry (excluding \*\*\*) declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2024. Derived from CR/PR at Table 6.3. Gross profit (excluding \*\*\*) declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2024. Derived from CR/PR at Table 6.3. Operating income (excluding \*\*\*) declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2024. Derived from CR/PR at Table 6.3. Net income (excluding \*\*\*) declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2024. Derived from CR/PR at Table 6.3.

<sup>283</sup> Sonco also argues that the Commission should exclude from its analysis data from integrated producers \*\*\* because these companies internally transfer their production to their fence rental units rather than making commercial sales and therefore do not compete with subject imports. Sonco’s Posthearing brief at 11-12. We acknowledge that these integrated firms did not make significant commercial sales during the POI outside of their fence rental operations, but this circumstance does not necessarily warrant the exclusion of these firms from the Commission’s analysis. *See, supra*, section IV.B.1 (captive production provision does not apply). Further, even if the financial data for internal consumption and transfers from \*\*\* were disregarded, the data for the rest of the domestic industry would also indicate the same trend of sharp declines in the domestic industry’s financial performance during the POI, albeit without operating and net losses. *See* CR/PR at Table J.3. The data for U.S. producers’ operation in the “merchant market” indicates that the domestic industry’s merchant market revenues declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2024. CR/PR at Table J.3. Merchant market gross profit declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2024. CR/PR at Table J.3. Merchant market operating income declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2024. CR/PR at Table J.3. Merchant market net income declined by \*\*\* percent from \$\*\*\* in 2022 to \$\*\*\* in 2024. CR/PR at Table J.3. We acknowledge that the industry’s merchant market ratio of operating income to net sales increased from \*\*\* percent in 2022 to \*\*\* percent in 2024, but note that its merchant market ratio of net income to net sales declined from \*\*\* percent to \*\*\* percent in 2024. CR/PR at Table J.3.

<sup>284</sup> Sonco also argues that the Commission should not rely on data from U.S. producers Stephens Pipe, \*\*\* to establish injury to the domestic industry from subject imports because these firms assert that they have not been injured by subject imports. Sonco’s Posthearing Brief at 10-12. Although the record contains limited information with respect to the domestic operations of Stephens Pipe, which did not provide usable financial data or pricing data, and \*\*\*, which also did not provide pricing data, the domestic industry’s share of the chain link panel U.S. shipments, primarily consisting of \*\*\* and subject imports, declined over the POI while subject imports’ share of U.S. shipments of chain link panels increased. Derived from CR/PR at Tables 3.10-3.11, 4.4-4.7. The domestic industry’s share of apparent U.S. consumption for chain link panels increased from \*\*\* percent in 2022 to \*\*\* percent in 2023 and (Continued...)

Given the moderate degree of substitutability between the domestic like product and subject imports and the importance of price, together with the evidence of competition between subject imports and the domestic like product based on price, as reviewed in section IV.D, we find that subject import underselling caused subject imports to gain market share from the domestic industry between 2022 and 2024, leading to declines in the domestic industry's production, capacity utilization, and shipments, an increase in its end-of-period inventories, and sharp declines in the industry's financial indicators.<sup>285</sup>

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then declined to \*\*\* percent in 2024; it was higher in interim 2025, at \*\*\* percent, than in interim 2024, at \*\*\* percent. *Id.* Subject imports' share of apparent U.S. consumption in the segment increased from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024; it was lower in interim 2025, at \*\*\* percent, than in interim 2024, at \*\*\* percent. *Id.* The overall collective share of apparent U.S. consumption accounted for by \*\*\* declined from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024; it was lower in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024. Derived from *id.* at Tables 4.13, J.1. Similarly, \*\*\* share of apparent U.S. consumption irregularly decreased over the POI, increasing from \*\*\* percent in 2022 to \*\*\* percent in 2023 and then decreasing to \*\*\* percent in 2024; it was slightly higher in interim 2025, at \*\*\* percent, than in interim 2024, at \*\*\* percent. Derived from \*\*\* U.S. Producer Questionnaire Response at II-8, II-12 (EDIS Document No. \*\*\*) and CR/PR at Table 4.13. Consistent with this observed market share loss, \*\*\* indicated that \*\*\*. \*\*\* U.S. Producer Questionnaire Response at II-3d (EDIS Document No. \*\*\*) and \*\*\* U.S. Importer Questionnaire Response at II-4 (EDIS Document No. \*\*\*). Accordingly, notwithstanding that these firms reported to be unaffected by subject imports to certain degrees, we observe that they experienced the same type of injury as the domestic industry as a whole, and we have attributed that injury to subject imports.

Furthermore, four U.S. producers did report negative effects from subject imports. Three U.S. producers (\*\*\*) reported that subject imports had negative effects on their investments, including cancellation, postponement or rejections of expansion projects. CR/PR at Tables 6.12, 6.13. In addition, two U.S. producers (\*\*\*) reported negative effects from subject imports on their growth and development. CR/PR at Tables 6.12, 6.13. Four U.S. producers (\*\*\*) reported that they anticipated negative effects of subject imports. CR/PR at Tables 6.12, 6.13. Three U.S. producers reported that they had to reduce prices because of subject import competition, one U.S. producer reported that it had to roll back announced price increases because of subject imports, and three U.S. producers reported that they had lost sales to subject imports. CR/PR at 5.35. We acknowledge that several domestic producers indicated in their questionnaire responses that subject imports did not have negative effects on their operations. However, we consider the domestic industry as a whole, which includes \*\*\* producers that did report negative effects from subject imports, including the \*\*\* U.S. producers of temporary steel fencing in 2024, \*\*\* and \*\*\*. CR/PR at Table 3.1. Given the lack of usable pricing or financial data from Stephens Pipe, \*\*\* were the two largest U.S. producers to submit usable pricing and financial data.

<sup>285</sup> Subject imports gained \*\*\* percentage points of market share at the expense of the domestic industry from 2022 to 2024. CR/PR at Table C.1. Although factors other than the importance of price in purchasing decisions and subject import underselling may have contributed to this market share shift, we observe that subject imports need not be the sole, or even primary, cause of material injury to the domestic industry under the statute. S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47. The Commission need only find that the subject imports have been more than an "incidental, tangential, or trivial" cause of injury to the domestic industry. *Nippon Steel Corp. v. USITC*, 345 F.3d at 1381.

We have also considered whether there are other factors that may have had an impact on the domestic industry to ensure that we are not attributing injury from such other factors to subject imports. Sonco argues that any injury to the domestic industry was a result of ZND's decision to produce wire mesh panels instead of chain link panels, and quality problems that purchasers experienced with ZND's wire mesh panels leading them to purchase subject imports of chain link panels instead.<sup>286</sup>

As discussed in section IV.B.4, we have considered Sonco's arguments regarding the lack of interchangeability of mesh and chain link fencing. While we acknowledge that the domestic industry is more concentrated in sales of wire mesh than subject imports and that certain purchasers have indicated preferences for one product type over another, both the domestic industry and subject imports produce and sell both chain and wire mesh in significant quantities and for many U.S. purchasers there is substantial interchangeability between chain link and wire mesh product.

As specifically to the quality issues Sonco raises, the record is mixed with respect to the quality and repairability of ZND's wire mesh panels as compared to chain link panels.<sup>287</sup> Petitioner contends that welded mesh panels are actually stronger than chain link panels, and denies that purchasers had any substantial problems with the durability or repairability of ZND's wire mesh panels.<sup>288</sup> However, representatives of Sonco, Federal Rent-A-Fence, and Stephens Pipe testified and presented evidence as to problems that customers had with welded wire mesh panels when they were introduced into the U.S. market,<sup>289</sup> and that some purchasers chose to purchase chain link panels from other suppliers because of those concerns.<sup>290</sup>

Notwithstanding these concerns, the record shows increasing acceptance of domestically produced wire mesh panels by the U.S. market over the POI. The percentage of U.S. producers' U.S. shipments with a mesh interior increased irregularly from \*\*\* percent in

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<sup>286</sup> Sonco's Prehearing Brief at 44-49; Sonco's Posthearing Brief at 12-13.

<sup>287</sup> The four responding purchasers were equally divided between finding that the domestic like product was comparable to subject with respect to quality meets industry standards and quality exceeds industry standards, and finding that the domestic like product was inferior to subject imports as to these two factors. CR/PR at Table 2.17.

<sup>288</sup> Petitioner's Posthearing Brief, Answers to Commissioner Questions, at 28-31.

<sup>289</sup> Hearing Tr. at 111-12 (Greer), 119 (Marinho), 125-26 (Orthey), 130-31 (Cochran).

<sup>290</sup> Sonco's Posthearing Brief at 12-15 and Exhs. 1-12. We note the extensive argumentation and documentation by the parties with respect to ZND's loss of sales to its customer \*\*\* during the POI, with at least one \*\*\* representative stating that his firm believed ZND's panels were \*\*\*. Petitioner's Prehearing Brief at Exh. 9, declaration of Daryl Nixon, at Paragraphs 2-3. However, Sonco provides declarations from \*\*\*. Sonco's Posthearing Brief at 13 and Exh. 9, declaration of \*\*\* and Exh. 4, declaration of \*\*\*.

2022 to \*\*\* percent in 2024, and was higher in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>291</sup> Moreover, despite Sonco’s contentions that wire mesh panels have lower quality, durability, and repairability than chain link panels, Sonco’s own website and marketing materials strongly praise ZND’s wire mesh panels for being “durable, “low-maintenance,” “reliable,” and “cost-effective,” and having “increased strength” with “stronger” and “long-lasting” welds.<sup>292</sup> Furthermore, as discussed above, ZND specifically lost sales to subject imports on the basis of price.

Thus, the record as a whole supports a finding of a moderate degree of substitutability between subject imports and the domestic like product, taking into account *inter alia* the issues Sonco raises as to the interchangeability of wire mesh and chain link fencing. Moreover, there are eight U.S. producers in the domestic industry, and four of them, including ZND, reported that they have suffered negative effects from subject imports.<sup>293</sup> As such, we do not consider that the issues Sonco raises regarding wire mesh fencing and ZND break the causal link between subject import underselling and the domestic industry’s market share loss to subject imports and consequent injury.

We have also considered U.S. demand. We recognize that apparent U.S. consumption declined by \*\*\* percent between 2022 and 2024. However, a decline in apparent U.S. consumption does not explain the significant underselling by subject imports or the domestic industry’s loss of \*\*\* percentage points of market share to low-priced subject imports between 2022 and 2024. Thus, declining demand does not explain the injury to the domestic industry that we have attributed to subject imports.

We have also considered the role of nonsubject imports in these investigations. Nonsubject imports had a small but increasing presence during the POI, with their share of apparent U.S. consumption rising by \*\*\* percentage points from \*\*\* percent in 2022 to \*\*\* percent in 2023 and \*\*\* percent in 2024; their market share was \*\*\* percentage points higher in interim 2025, at \*\*\* percent, compared with \*\*\* percent in interim 2024.<sup>294</sup> While the domestic industry lost \*\*\* percentage points of market share to nonsubject imports between 2022 and 2024, the industry experienced a much greater loss of market share of \*\*\* percentage points to subject imports during that period, indicating that subject imports caused injury to the domestic industry distinct from and greater than any caused by nonsubject imports.<sup>295</sup>

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<sup>291</sup> CR/PR at Table 3.11.

<sup>292</sup> Petitioner’s Posthearing Brief, Answers to Commissioner Questions, at 29 and Exhs. 24-25.

<sup>293</sup> CR/PR at Tables 6.12, 6.13.

<sup>294</sup> CR/PR at Table C.1.

<sup>295</sup> CR/PR at Table C.1.

## V. Critical Circumstances

### A. Legal Standards

On March 16, 2026, Commerce issued its final determination in the antidumping duty investigation and found that critical circumstances exist with respect to subject imports from the China-wide entity (including Shijiazhuang Sd Company Ltd and Yongau/Yuelei), but do not exist with respect to all other producers and/or exporters granted a separate rate.<sup>296</sup> On March 16, 2026, Commerce also issued its final determination in the countervailing duty investigation and found that critical circumstances exist with respect to subject imports from Shijiazhuang SD and non-responsive companies based on facts otherwise available.<sup>297</sup> Because we have determined that the domestic industry is materially injured by reason of subject imports from China, we must further determine “whether the imports subject to the affirmative {Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued.”<sup>298</sup> The SAA indicates that the Commission is to determine “whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order” and specifically “whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order.”<sup>299</sup> The legislative history for the critical circumstances provision indicates that the provision was designed “to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}.”<sup>300</sup> An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to the

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<sup>296</sup> *Temporary Steel Fencing From the People’s Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 91 Fed. Reg. 12577, 12578 (March 16, 2026).

<sup>297</sup> *Temporary Steel Fencing From the People’s Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 91 Fed. Reg. 12567, 12568 (March 16, 2026).

<sup>298</sup> 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

<sup>299</sup> SAA at 877.

<sup>300</sup> *ICC Industries, Inc. v United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. Rep. No. 96-317 at 63 (1979), *aff’g* 632 F. Supp. 36 (Ct. Int’l Trade 1986). See 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

affirmative Commerce critical circumstances determination for a period 90 days prior to the suspension of liquidation.

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

(I) the timing and the volume of the imports,

(II) a rapid increase in inventories of the imports, and

(III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.<sup>301</sup>

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petition with those subsequent to the filing of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.<sup>302</sup>

## **B. The Parties' Arguments**

*Petitioner's Arguments.* Petitioner did not address critical circumstances in its prehearing or posthearing briefs or its final comments.

*Respondent's Arguments.* Sonco argued (before Commerce's final determination) that five-month comparison periods are appropriate in this proceeding, since Commerce's first preliminary determination in the countervailing duty investigation in June 2025 came five months after the petitions were filed in January 2025. It argues that the increases in subject imports in the antidumping and countervailing duty investigations were hardly significant in light of increasing consumption and the seasonality of the industry. Sonco asserts that the \*\*\* increases in inventories with respect to both investigations do not qualify under the statute as "rapid increases" and represented only a small fraction of apparent U.S. consumption. Thus, Sonco argues that the imports subject to Commerce's affirmative critical circumstances findings are not likely to seriously undermine the remedial effect of the orders.<sup>303</sup> In its final comments, Sonco asserts that the data in the final Commission report show declines in subject import

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<sup>301</sup> 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

<sup>302</sup> See *Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-43, 731-TA-1095-97, USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-61 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

<sup>303</sup> Sonco's Prehearing Brief at 58-60.

volumes based on both five- and six-month review periods in both the antidumping and countervailing duty investigations, as well as declines in inventory levels.<sup>304</sup>

## C. Analysis

### 1. Choice of Time Period

We first consider the appropriate period for comparison of pre-petition and post-petition levels of subject imports from China. The Commission frequently relies on six-month comparison periods for its critical circumstances analysis.<sup>305</sup> However, it has relied on a shorter comparison period for both its antidumping and countervailing duty investigations when Commerce's preliminary determination applicable to the imports from the subject country fell within the six-month post-petition period the Commission typically considers.<sup>306</sup> That situation arises here for our critical circumstances analysis of imports from China because the petitions

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<sup>304</sup> Sonco's Final Comments at 15 n.70.

<sup>305</sup> The Commission has relied on a shorter comparison period for both its antidumping duty and countervailing duty investigations when Commerce's preliminary determination applicable to the imports from the subject country fell within the six-month post-petition period the Commission typically considers. See *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination caused reduction of subject import volume in sixth month); *Wire Rod Final I*, USITC Pub. 4752 at 46-47 (Jan. 2018) (regarding subject imports from Russia).

The Commission may also use different periods when the product is seasonal. See *1,1,1,2--Tetrafluoroethane (R-134a) from China*, Inv. No. 731-TA-1313 (Final), USITC Pub. 4679 at 25 (Apr. 2017) (seasonal product); *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007) (declining to analyze different periods absent seasonality). See CR/PR at 2.9 ("Firms reported seasonal variations in demand with higher demand in the second and third quarters of the year and lower demand in the first and fourth quarters.").

<sup>306</sup> See *Carbon and Certain Alloy Steel Wire Rod from Belarus, Russia, and the United Arab Emirates*, Inv. Nos. 731-TA-1349, 1352, and 1357 (Final), USITC Pub. 4752 at 46-47 (Jan. 2018) (regarding subject imports from Russia); *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547 and 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sept. 2016) (regarding subject imports from Brazil); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4620 at 35-40 (July 2016) (regarding subject imports from China, Italy, and Korea); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512 and 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015).

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

were filed on January 15, 2025, and Commerce’s initial preliminary determination, which was in the countervailing duty investigation, was issued on June 20, 2025.<sup>307</sup>

In light of the foregoing, we have determined to use a five-month comparison period. Specifically, we have determined to compare the volume of subject imports five months prior to and including the filing of the petition (September 2024 to January 2025) with the volume of subject imports five months after the filing of the petition (February 2025 to June 2025) in our critical circumstances analysis of imports from China subject to the antidumping and countervailing duty investigations. No party has contested the five-month comparison periods for this analysis.<sup>308</sup>

## 2. Import Volume and Inventories

Subject imports from China subject to Commerce’s affirmative critical circumstances determination in the antidumping investigation declined from \*\*\* pounds in the pre-petition period to \*\*\* pounds in the post-petition period, which is a decline of \*\*\* pounds or \*\*\* percent.<sup>309</sup> Subject imports from China subject to Commerce’s affirmative critical circumstances determination in the countervailing duty investigation declined from \*\*\* pounds in the pre-petition period to \*\*\* pounds in the post-petition period, which is a decline of \*\*\* pounds or \*\*\* percent.<sup>310</sup>

Questionnaire data concerning end-of-period inventories of these imports from December 2024 through June 2025 are presented in the staff report at Tables 4.10 and 4.12.

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<sup>307</sup> *Temporary Steel Fencing From the People’s Republic of China: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical Circumstances, in Part, and Alignment of Final Determination with the Final Antidumping Determination*, 90 Fed. Reg. 26268, 26269 (June 20, 2025).

We note that Commerce’s preliminary determination with respect to the antidumping duty investigation was rendered on August 19, 2025, subsequent to five months after the filing of the petition. *Temporary Steel Fencing From the People’s Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination and Extension of Provisional Measures*, 90 Fed. Reg. 40332, 40333 (Aug. 19, 2025). However, consistent with previous cases, we used the same pre- and post-petition periods for both antidumping and countervailing duty critical circumstances analyses. *Certain Pea Protein from China*, Inv. Nos. 701-TA-692 and 731-TA-1628 (Final), USITC Pub. 5529 at 43 n.253 (Aug. 2024); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. Nos. 701-TA-534-537 and 731-TA-1274 (Final), USITC Pub. 4620 at 35-36 (Sept. 2016); *Disposable Aluminum Containers, Pans, Trays, and Lids from China*, Inv. Nos. 701-TA-727 and 731-TA-1695 (Final), USITC Pub. 5611 at 36 n.255 (Apr. 2025).

<sup>308</sup> Sonco’s Prehearing Brief at 58-59.

<sup>309</sup> CR/PR at Table 4.11.

<sup>310</sup> CR/PR at Table 4.9.

Regarding the antidumping duty investigation, the questionnaire data show that inventories as of the end of June 2025 were \*\*\* pounds or \*\*\* percent lower than at the end of January 2025, the month in which the petition was filed.<sup>311</sup> Regarding the countervailing duty investigation, the questionnaire data show that inventories as of the end of June 2025 were \*\*\* pounds or \*\*\* percent lower than at the end of January 2025, the month in which the petition was filed.<sup>312</sup>

### **3. Conclusion**

In light of the foregoing, we do not find that these imports are likely to undermine seriously the effect of the antidumping duty or countervailing duty orders. Consequently, we find that critical circumstances do not exist with respect to subject imports from China that are subject to Commerce's final affirmative determinations of critical circumstances in the antidumping and countervailing duty investigations.

## **VI. Conclusion**

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of temporary steel fencing from China that are sold in the United States at less than fair value and subsidized by the government of China. We also find that critical circumstances do not exist with respect to imports from China that are subject to Commerce's final affirmative critical circumstances determinations in its antidumping and countervailing duty investigations.

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<sup>311</sup> CR/PR at Table 4.12.

<sup>312</sup> CR/PR at Table 4.10.

# Part 1: Introduction

## Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by ZND US Inc. (“ZND”), Statesville, North Carolina, on January 15, 2025, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value (“LTFV”) imports of temporary steel fencing<sup>1</sup> from China. Table 1.1 presents information relating to the background of these investigations.<sup>2 3</sup>

**Table 1.1 Temporary steel fencing: Information relating to the background and schedule of this proceeding**

Effective date	Action
January 15, 2025	Petitions filed with Commerce and the Commission; institution of the Commission investigations (90 FR 7702, January 22, 2025)
February 4, 2025	Commerce’s notices of initiation of antidumping duty (“AD”) and countervailing duty (“CVD”) investigations (90 FR 9315 (AD) and 90 FR 9311 (CVD), February 11, 2025)
March 3, 2025	Commission preliminary determinations (90 FR 11436, March 6, 2025)
June 20, 2025	Commerce’s preliminary CVD determination (90 FR 26268)
August 19, 2025	Commerce’s preliminary AD determination (90 FR 40332); scheduling of final phase of Commission investigations (90 FR 44103, September 11, 2025)
November 21, 2025	First revised scheduling of final phase of Commission investigations (90 FR 54368, November 26, 2025)
December 8, 2025	Second revised scheduling of final phase of Commission investigations (90 FR 57779, December 12, 2025)
March 12, 2026	Commission’s hearing
March 16, 2026	Commerce’s final AD (91 FR 12577) and CVD (91 FR 12567) determinations
April 9, 2026	Commission’s vote
April 30, 2026	Commission’s views

Note: Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission revised its schedule for this proceeding.

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

<sup>2</sup> Pertinent Federal Register notices are referenced in appendix A and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>3</sup> Appendix B presents the witnesses who appeared at the Commission’s hearing.

## Statutory criteria

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

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

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that—<sup>4</sup>

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

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<sup>4</sup> Amended by PL 114—27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

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

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

## **Organization of report**

Part 1 of this report presents information on the subject merchandise, subsidy rates/dumping margins, and domestic like product. Part 2 of this report presents information on conditions of competition and other relevant economic factors. Part 3 presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts 4 and 5 present the volume of subject imports and pricing of domestic and imported products, respectively. Part 6 presents information on the financial experience of U.S. producers. Part 7 presents the statutory requirements and information obtained for use in the Commission’s consideration of the question of threat of material injury as well as information regarding nonsubject countries.

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<sup>5</sup> Amended by PL 114—27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

## Market summary

Temporary steel fencing is generally used as fencing for construction sites, security perimeters, and events, as well as animal kennels. The leading U.S. producers of temporary steel fencing are \*\*\*. Staff are not aware of the leading Chinese producers of temporary steel fencing, but received foreign producer questionnaire responses from three Chinese producers believed to account for less than \*\*\* percent of Chinese production of temporary steel fencing in 2024.<sup>6</sup> The leading U.S. importers of temporary steel fencing from China are \*\*\*, while the leading importers of temporary steel fencing from nonsubject countries (primarily Canada and Vietnam) include \*\*\*. U.S. purchasers of temporary steel fencing include temporary fencing rental companies, distributors, and retailers. Leading purchasers include \*\*\*.

Apparent U.S. consumption of temporary steel fencing totaled approximately \*\*\* pounds (\$\*\*\*) in 2024. Currently, ten firms are known to produce temporary steel fencing in the United States, eight of which responded to the Commission's questionnaire. U.S. producers' U.S. shipments of temporary steel fencing totaled 48.6 million pounds (\$75.8 million) in 2024 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. shipments of imports from subject sources totaled 38.3 million pounds (\$57.4 million) in 2024 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. shipments of imports from nonsubject sources totaled \*\*\* pounds (\$\*\*\*) in 2024 and accounted for \*\*\* percent of apparent U.S. consumption by quantity and \*\*\* percent by value.

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<sup>6</sup> Commerce issued quantity and value questionnaires to ten exporters and/or producers of temporary steel fencing and selected Shenzhou Yongao Metal Products Co., Ltd ("Yongao") and Shijiazhuang Sd Company Ltd ("SD Company"), believing these two firms to be the exporters and/or producers with the largest volume of sales of subject merchandise during Commerce's period of investigation. Less-Than-Fair-Value Investigation of Temporary Steel Fencing from the People's Republic of China: Respondent Selection Memorandum, Commerce, March 6, 2025. The Commission received a foreign producer questionnaire from SD Company during the preliminary phase of these investigations, but not for these final phase investigations.

## **Summary data and data sources**

A summary of data collected in these investigations is presented in appendix C, table C.1. The Commission’s questionnaires collected data for the years 2022 to 2024 and interim periods January through June of 2024 (“interim 2024”) and January through June of 2025 (“interim 2025”). Except as noted, U.S. industry data are based on questionnaire responses of 8 firms that accounted for an estimated \*\*\* percent of U.S. production of temporary steel fencing during 2024. U.S. imports are based on questionnaire responses of 18 firms that accounted for an estimated \*\*\* percent of imports from China and virtually all imports from nonsubject sources during 2024.

## **Previous and related investigations**

Temporary steel fencing has not been the subject of prior countervailing or antidumping duty investigations in the United States.

## Nature and extent of subsidies and sales at LTFV

### Subsidies

Commerce published notices in the Federal Register of its preliminary determination on June 20, 2025, and its final determination on March 16, 2026, of countervailable subsidies for producers and exporters of temporary steel fencing from China.<sup>7</sup> Table 1.2 presents Commerce's findings of subsidization of temporary steel fencing in China.

**Table 1.2 Temporary steel fencing: Commerce's subsidy determination with respect to imports from China**

Entity	Preliminary countervailable subsidy rate (percent)	Final countervailable subsidy rate (percent)
Hebei Minmetals Co., Ltd	33.27	49.19
Shijiazhuang SD Company Ltd	139.20	178.97
Anping County Xingpeng Hardware Co., Ltd	301.83	178.97
Shenzhou Yuelei Metal Products Co., Ltd	301.83	178.97
Sichuan Gold-Link Industry	301.83	178.97
Sourcing Solution Co., Ltd	301.83	178.97
Tianjin Mengsheng Metal Products	301.83	178.97
All others	86.24	49.19

Source: 90 FR 26268, June 20, 2025, and 91 FR 12567, March 16, 2026.

Note: For further information on programs determined to be countervailable, see Commerce's associated Issues and Decision Memorandum.

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<sup>7</sup> 90 FR 26268, June 20, 2025, and 91 FR 12567, March 16, 2026.

## Sales at LTFV

Commerce published notices in the Federal Register of its preliminary determination on August 19, 2025, and its final determination on March 16, 2026, of sales at LTFV with respect to imports from China.<sup>8</sup> Table 1.3 presents Commerce’s dumping margins with respect to imports of temporary steel fencing from China.

**Table 1.3 Temporary steel fencing: Commerce’s weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Preliminary dumping margin (percent)	Final dumping margin (percent)
Shenzhou Yongao Metal Products Co., Ltd./Shenzhou Yuelei Metal Products Co., Ltd.	Shenzhou Yongao Metal Products Co., Ltd./Shenzhou Yuelei Metal Products Co., Ltd.	187.69	184.27
Shijiazhuang Sd Company Ltd	Huanghua Xingchang Hardware Products Co., Ltd.	136.57	184.27
Shijiazhuang Sd Company Ltd	Huanghua Shengrundong Hardware Products Co., Ltd.	136.57	184.27
Shijiazhuang Sd Company Ltd	Hebei Oriental Star Metal Products Co., Ltd	136.57	184.27
Hebei Minmetals Co., Ltd	Huanghua Wangang Hardware Co., Ltd	136.57	129.70
Hebei Minmetals Co., Ltd	Huanghua Taiyue Hardware Co., Ltd	136.57	129.70
Hebei Minmetals Co., Ltd	Hebei Wuxin Garden Products Co., Ltd	136.57	129.70
Hebei Minmetals Co., Ltd	Huanghua Qingxin Metal Products Co	136.57	129.70
Hebei Minmetals Co., Ltd	Huanghua Xingyu Hardware Products Co., Ltd	136.57	129.70
Hebei Minmetals Co., Ltd	Huanghua Deyue Hardware Co., Ltd	136.57	129.70
Hebei Minmetals Co., Ltd	Cangzhou Hualing Metal Products Co., Ltd	136.57	129.70
Hebei Minmetals Co., Ltd	Huanghua Huanyu Hardware Factory	136.57	129.70

<sup>8</sup> 90 FR 40332, August 19, 2025, as corrected in 90 FR 42385, September 2, 2025, and 91 FR 12577, March 16, 2026.

<b>Exporter</b>	<b>Producer</b>	<b>Preliminary dumping margin (percent)</b>	<b>Final dumping margin (percent)</b>
Tianjin Linkwel International Trading Co., Ltd	Tianjin Lianhao Metal Products Co., Ltd	136.57	129.70
Tianjin Linkwel International Trading Co., Ltd	Changzhou Lianrui Metal Products Co., Ltd	136.57	129.70
Shantou Jiayu Trading Co., Ltd	Huanghua Juntai Hardware Products Co., Ltd	136.57	129.70
Shijiazhuang Shuangming Trade Co., Ltd	Huanghua Wangang Hardware Co., Ltd.	136.57	129.70
Shijiazhuang Shuangming Trade Co., Ltd	Huanghua Taiyue Hardware Co., Ltd	136.57	129.70
Shijiazhuang Shuangming Trade Co., Ltd	Hebei Wuxin Garden Products Co., Ltd	136.57	129.70
Shijiazhuang Shuangming Trade Co., Ltd	Huanghua Qingxin Metal Products Co	136.57	129.70
Shijiazhuang Shuangming Trade Co., Ltd	Huanghua Xingyu Hardware Products Co., Ltd	136.57	129.70
Metaltec Group Co., Limited	Shijiazhuang Shuangming Trade Co., Ltd	136.57	129.70
Metaltec Group Co., Limited	Hebei Wangang Hardware Co., Ltd	136.57	129.70
Metaltec Group Co., Limited	Huanghua Taiyue Hardware Co., Ltd	136.57	129.70
Metaltec Group Co., Limited	Hebei Wuxin Garden Products Co., Ltd	136.57	129.70
Metaltec Group Co., Limited	Huanghua Qingxin Metal Products Co., Ltd	136.57	129.70
Metaltec Group Co., Limited	Huanghua Xingyu Hardware Products Co., Ltd	136.57	129.70
Hebei Yelang Imp. & Exp. Trade Co., Ltd	Huanghua Pengxiang Hardware Products Co., Ltd.	136.57	129.70
Joint Force Int'l Co., Limited	Hebei Minmetals Co., Ltd	136.57	129.70
Joint Force Int'l Co., Limited	Huanghua Wangang Hardware Co., Ltd	136.57	129.70
Joint Force Int'l Co., Limited	Huanghua Taiyue Hardware Co., Ltd	136.57	129.70
Joint Force Int'l Co., Limited	Hebei Wuxin Garden Products Co., Ltd	136.57	129.70

<b>Exporter</b>	<b>Producer</b>	<b>Preliminary dumping margin (percent)</b>	<b>Final dumping margin (percent)</b>
Joint Force Int'l Co., Limited	Huanghua Qingxin Metal Products Co., Ltd	136.57	129.70
Joint Force Int'l Co., Limited	Huanghua Xingyu Hardware Products Co., Ltd	136.57	129.70
Joint Force Int'l Co., Limited	Huanghua Deyue Hardware Co., Ltd	136.57	129.70
Joint Force Int'l Co., Limited	Huanghua Huanyu Hardware Factory	136.57	129.70
Hebei Jinshi Industrial Metal Co., Ltd	Tangshan ZhongRui Industrial Co., Ltd	136.57	129.70
Hebei Jinshi Industrial Metal Co., Ltd	Huanghua Tianhang Hardware Products Co., Ltd	136.57	129.70
Hebei Jinshi Industrial Metal Co., Ltd	Hebei Tinlin Metal Products Co., Ltd	136.57	129.70
Hebei Jinshi Industrial Metal Co., Ltd	Huanghua Xindarui Hardware Products Co., Ltd	136.57	129.70
Hebei Haiao Wire Mesh Products Co., Ltd	Raoyang Shengshi Metal Products Co., Ltd	136.57	129.70
Anping Chengxin Metal Mesh Co., Ltd	Anping Chengxin Metal Mesh Co., Ltd	136.57	129.70
Hebei Houtuo Co., Ltd	Huanghua Aiyuan Hardware Products Co., Ltd	136.57	129.70
Hebei Neweast Yilong Trading Co., Ltd	Huanghua City Deyue Hardware Co., Ltd	136.57	129.70
Hebei Giant Metal Technology Co., Ltd	Hebei Giant Metal Technology Co., Ltd	136.57	129.70
All others		187.69	184.27

Source: 90 FR 40332, August 19, 2025, as corrected in 90 FR 42385, September 2, 2025, and 91 FR 12577, March 16, 2026.

Note: In Commerce's final determinations, it found that Shenzhou Yongao Metal Products Co. Ltd./Shenzhou Yuelei Metal Products Co., Ltd. and Shijiazhuang Sd Company Ltd. (SD) are not eligible for a separate rate and therefore part of the China-wide entity.

## The subject merchandise

### Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:<sup>9</sup>

Temporary steel fencing consists of temporary steel fence panels and temporary steel fence stands. Temporary steel fence panels, when assembled with temporary steel fence stands or other types of stands outside of the scope, with each other, or with posts, create a free-standing fence. Temporary steel fence panels are covered by the scope regardless of whether they attach to a stand or the type of stand to which they connect.

Temporary steel fence panels have a welded frame of steel tubing and an interior consisting of chain link, steel wire mesh, or other steel materials that are not more than ten millimeters in actual diameter or width. The steel tubing may surround all edges of the temporary steel fence panel or only be attached along two parallel sides of the panel. All temporary steel fence panels with at least two framed sides are covered by the scope, regardless of the number of edges framed with steel tubing.

Temporary steel fence panels are typically between 10 and 12 feet long and six to eight feet high, though all temporary steel fence panels are covered by the scope regardless of dimension or weight as long as a single panel meets each of the three following criteria: (1) it has over seven and a half square feet in actual surface area; (2) it weighs more than four pounds; and (3) it weighs less than 1.92 pounds per square foot. Temporary steel fence panels may be square, rectangular, or have rounded edges, and may or may not have gates, doors, wheels, or barbed wire or other features, though all temporary steel fence panels are covered by the scope regardless of shape and other features. Temporary steel fence panels may have one or more horizontal, vertical, or diagonal reinforcement tubes made of steel welded to the inside frame, though all temporary steel fence panels are covered by the scope regardless of the existence, number, or type of reinforcement tubes attached to the panel. Temporary steel fence panels may have extensions, pins, tubes, or holes at the bottom of the panel, but all temporary steel fence panels are covered regardless of the existence of such features.

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<sup>9</sup> 91 FR 12567 and 91 FR 12577, March 16, 2026.

Steel fence stands are shapes made of steel that stand flat on the ground and have one or two open tubes or solid pins into which temporary steel fence panels are inserted to stand erect. The steel fence stand may be made of welded steel tubing or may be a flat steel plate with one or two tubes or pins welded onto the plate for connecting the panels.

Temporary steel fencing is covered by the scope regardless of coating, painting, or other finish. Both temporary steel fence panels and temporary steel fence stands are covered by the scope, whether imported assembled or unassembled, and whether imported together or separately.

Subject merchandise includes material matching the above description that has been finished, assembled, or packaged in a third country, including by coating, painting, assembling, attaching to, or packaging with another product, or any other finishing, assembly, or packaging operation that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the temporary steel fencing.

Temporary steel fencing is included in the scope of this investigation whether or not imported attached to, or in conjunction with, other parts and accessories such as posts, hooks, rings, brackets, couplers, clips, connectors, handles, brackets, or latches. If temporary steel fencing is imported attached to, or in conjunction with, such non-subject merchandise, only the temporary steel fencing is included in the scope.

Excluded from the scope of this investigation are decorative steel fence panels. Decorative steel fence panels are steel fence panels that have all of the following characteristics: (i) the panel's long ends are no more than 48 inches; (ii) the panel's short ends are no more than 38 inches; (iii) the

panel weighs 7 pounds or less; (iv) the panel is framed on all sides with steel tubing no wider than 10 mm; and (v) the panel's the interior contains a decorative pattern (meaning a pattern other than square, rectangular, diamond, or hexagonal meshing) accounting for at least 5 percent of the area within the frame.

## **Tariff treatment**

Temporary steel fencing is currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting number 7308.90.9590. This statistical reporting number also contains products outside the scope of these investigations. The general rate of duty is “free” for HTS subheading 7308.90.95.<sup>10</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Below is a summary of additional tariffs applied to the product during the period of investigation. See table 1.4 for a summary of additional tariffs in place as of March 31, 2026.

### **Section 232 tariffs**

Temporary steel fencing originating in China is subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended, applied to the declared value of the steel content of the imported article.<sup>11</sup>

### **Section 301 tariffs**

Effective August 23, 2018, temporary steel fencing originating in China is subject to an additional 25 percent ad valorem duty under section 301 of the Trade Act of 1974.<sup>12</sup>

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<sup>10</sup> The merchandise subject to these reviews may also be imported under the following HTS statistical reporting numbers: 7323.99.9080 and 7326.90.8688. The general rate of duty is 3.4 percent for HTS subheading 7323.99.90 and 2.9 percent for 7326.90.86. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 73.25, 73.42, 73.44.

<sup>11</sup> Effective March 12, 2025, temporary steel fencing originating in China became subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. Effective June 4, 2025, this section 232 rate of duty increased to 50 percent. The duty is applied to the declared value of the steel content of the product if the product is classified in chapter 73 of the HTS; if the product is not classified in chapter 73, the duty is applied to the full value of the product. 90 FR 9817, February 18, 2025; 90 FR 24199, June 9, 2025. See also HTS heading 9903.81.90 and U.S. note 16(m) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.69, 99.3.450.

<sup>12</sup> 83 FR 40823, August 16, 2018. See also HTS heading 9903.88.02 and U.S. notes 20(c) and 20(d) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.97, 99.3.463.

## Section 122 tariffs

Temporary steel fencing originating in China is not subject to tariffs initiated in February 2026 under section 122 of the Trade Act of 1974.<sup>13</sup>

## Tariffs initiated under the International Emergency Economic Powers Act (“IEEPA”)<sup>14</sup>

Effective February 20, 2026, all tariffs initiated under IEEPA were terminated. Below is a history of the IEEPA tariffs relevant to temporary steel fencing originating in China that were in effect until February 20, 2026.<sup>15</sup>

### Country specific IEEPA tariffs

Effective February 4, 2025, temporary steel fencing originating in China was subject to an additional 10 percent ad valorem duty under IEEPA, and on March 4, 2025, that additional duty increased to 20 percent ad valorem. However, effective November 10, 2025, that additional duty was reduced back to 10 percent.<sup>16</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>17</sup>

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<sup>13</sup> Section 122 authorizes the President to impose a temporary import surcharge for a period not exceeding 150 days unless such period is extended by an Act of the Congress. Articles subject to section 232 tariffs, including temporary steel fencing, are not subject to the tariffs initiated under section 122. 91 FR 9339, February 25, 2026. See also HTS heading 9903.03.06 and U.S. note 2(aa)(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.58 and 99.3.411.

<sup>14</sup> Multiple tariffs were enacted under the authority of the International Emergency Economic Powers Act (“IEEPA”), including tariffs that applied to countries that may not be subject in this proceeding. Tariffs specific to Canada, China, and Mexico were initiated in February 2025. Tariffs initiated in April 2025 under IEEPA were applied globally. Tariffs specific to Brazil were initiated in July 2025. Tariffs specific to India were initiated in August 2025 and terminated effective February 7, 2026. Tariffs under IEEPA were amended over time. All tariffs initiated under IEEPA were terminated effective February 20, 2026. 91 FR 9437, February 25, 2026.

<sup>15</sup> 91 FR 9437, February 25, 2026.

<sup>16</sup> 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025; 90 FR 50725, November 7, 2025. See also HTS heading 9903.01.20 and U.S. note 2(s) and HTS heading 9903.01.24 and U.S. note 2(u) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.3, 99.3.4, 99.3.374, and 99.3.375.

<sup>17</sup> 91 FR 9437, February 25, 2026.

Tariffs initiated in April 2025 under IEEPA

Temporary steel fencing originating in China was not subject to tariffs initiated in April 2025 under IEEPA.<sup>18</sup> Effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated.<sup>19</sup>

**Table 1.4 Temporary steel fencing: Additional tariffs on imports originating in China as of March 31, 2026**

Duty rates in percent ad valorem

<b>Additional tariff</b>	<b>China</b>
Section 232	50
Section 301	25
Section 122	NA
Total additional ad valorem rate	75

Source: Federal Register notices and other sources cited in this section (Tariff treatment).

Note: For the purposes of this table, “not applicable” is shown as “NA.” This applies when the subject product from that subject country is not subject to the tariff for any reason.

Note: Duty rates in the table reflect the duty rates as of the writing of this report. See the text above for historical changes to the additional tariffs.

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<sup>18</sup> Articles subject to section 232 tariffs, including temporary steel fencing, are not subject to the tariffs initiated in April 2025 under IEEPA. However, the non-steel content in temporary steel fencing, if any, is subject to the tariffs initiated in April 2025 under IEEPA. 90 FR 15041, April 7, 2025; 90 FR 24199, June 9, 2025. See also HTS headings 9903.01.25 and 9903.01.33 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 4, Publication 5711, February 2026, pp. 99.3.4, 99.3.375, 99.3.377.

<sup>19</sup> 91 FR 9437, February 25, 2026.

## The product

### Description and applications

Temporary steel fencing consists of temporary steel fence panels and temporary steel fence stands used to create perimeters or enclosures to keep people and animals from moving in and out of spaces. Temporary steel fencing panels are connected to tubes or pins on the temporary steel fence stands to create a free-standing fence.<sup>20</sup> Tubes or pins extend from the horizontal bar of the panel and are connected to the tubes or pins on the stands.<sup>21</sup> Pins are thinner than tubes so that the pins can be inserted into the tubes when attaching a panel to a stand.<sup>22</sup> Temporary steel fencing is almost always galvanized and can be painted or powder coated as well.<sup>23</sup>

As stated in Commerce's scope, a temporary steel fencing panel can also be attached to a post, although posts are not included in the scope of these investigations.<sup>24</sup> While stands connect to panels by inserting pins into tubes, posts connect to panels using couplers, rings, or other systems. Although less common, the panels can also be attached to each other using a coupler or another attachment device to create a fencing system that does not use stands or posts.<sup>25</sup> Figure 1.1 shows examples of temporary steel fencing with interiors of wire mesh (the picture on the left) and chain link (the picture on the right and bottom). Figure 1.2 shows examples of temporary steel fencing animal kennels (also known as animal enclosures).

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<sup>20</sup> Petitioner's Response to Commerce's Second Supplemental Questions, Exhibit 1.4.Supp.2. Permanent steel fencing is not included in the scope of these investigations and is distinguished from temporary steel fencing in several ways. Among other characteristics, permanent steel fencing is designed for permanent use and longevity, attached to fence posts that are driven into the ground, and typically consists of interior materials that are greater than 10 millimeters in diameter. Petitions, p. 1.4. Hearing transcript, p. 38 (Drake).

<sup>21</sup> Conference transcript, pp. 60 to 61, 63 (Drake).

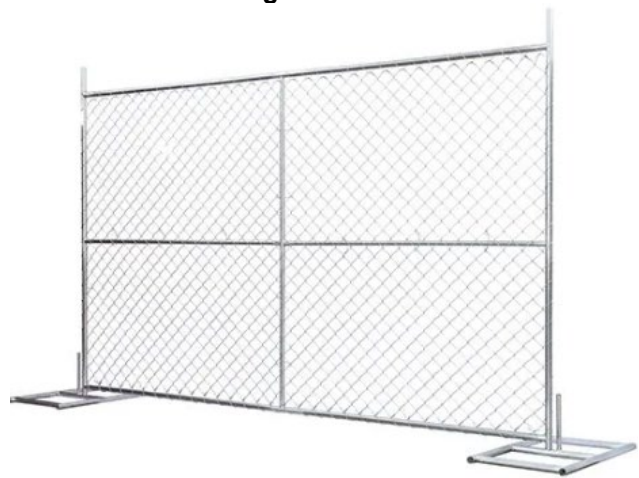
<sup>22</sup> Conference transcript, p. 62 (Walters).

<sup>23</sup> Conference transcript, pp. 85 to 86 (van Kesteren).

<sup>24</sup> Conference transcript, p. 63 (Drake).

<sup>25</sup> Conference transcript, pp. 59 to 60 (Drake).

**Figure 1.1: Temporary steel fencing: Wire mesh and chain link fencing**



Source: ZND US Inc, ST612.LW-Easy Carry, <https://www.znd.com/us/zndus-products/temporary-fencing/cbaf9872-f2ff-45be-a968-086e24d275a7/>, accessed February 7, 2025. SONCO Worldwide, 6' x 10' Versa ChainLink Temp Fence Panel, <https://www.soncocrowdcontrol.com/6-x-10-versa-chain-link-temporary-fence-panel>, accessed February 7, 2025. SONCO Worldwide, Versa Gate Temporary Fence Panel, <https://www.soncocrowdcontrol.com/versa-gate-panel>, accessed March 20, 2026.

**Figure 1.2: Temporary steel fencing: Animal kennel**



Source: Behlen Country, Ruff Guard Kennel, <https://www.behlencountry.com/products/ruff-guard-kennel/>, accessed February 11, 2025. Stephens Pipe & Steel, Kennel Products, <https://www.spsfence.com/products/kennel/>, accessed March 20, 2026.

The applications for temporary steel fencing include, but are not limited to, fencing for construction sites, security perimeters, and events, as well as animal kennels.<sup>26</sup> Demand for temporary steel fencing in the construction and events segments of the market generally follows seasonal patterns and is higher when construction and outdoor events are most active.<sup>27</sup>

Temporary fencing is designed to be assembled and then disassembled so it can be moved from site to site and re-used.<sup>28</sup> Temporary steel fencing panels and stands are not permanently attached, which increases the ease of moving or transporting the fencing.<sup>29</sup> The narrower diameter of the steel materials (usually steel wire) used in the interior of temporary steel fencing is designed to provide a perimeter or enclosure that prevents unwanted entry but permits visibility through a mesh or chain link panel with a relatively simple design.<sup>30</sup>

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<sup>26</sup> Petitions, p. 1.9. Pedestrian/crowd control barriers generally would not be within the scope of these investigations because pedestrian/crowd control barriers usually contain interior bars with a diameter or width greater than 10 millimeters. Petitioner's Response to Commerce's Supplemental Questions (public version), pp. 1.Supp.3 to 1.Supp.4.

<sup>27</sup> Conference transcript, pp. 53 to 54 (Walters); hearing transcript, pp. 51 (Drake), 29 (Walters).

<sup>28</sup> Petitioner's Response to Commerce's Supplemental Questions, p. 1.Supp.4.

<sup>29</sup> Conference transcript, pp. 62 to 63 (van Kesteren).

<sup>30</sup> Petitioner's Response to Commerce's Supplemental Questions, p. 1.Supp.7.

Temporary steel fencing may contain a gate or door through which a vehicle, pedestrian, or animal may pass.<sup>31</sup>

Temporary steel fencing panels consist of a frame of hollow structural steel tubing and a steel interior consisting of chain link, wire mesh, or other steel materials.<sup>32</sup> Chain link fencing panels are more flexible while wire mesh panels are more rigid.<sup>33</sup> The interior steel materials can be laced onto the frame or welded or tied to the frame.<sup>34</sup> Panels within the scope of these investigations are over seven and a half square feet in actual surface area, weigh more than four pounds, weigh less than 1.92 pounds per square foot, and have interior materials (chain link, steel wire mesh, or other steel materials) that are not more than 10 millimeters in actual diameter or width.<sup>35</sup> Panels are used in combination to produce a perimeter of a certain distance. For example, a 120-foot perimeter might use twelve 10-foot panels or ten 12-foot panels.<sup>36</sup> Extension panels can be vertically stacked on another panel to increase the height of a temporary steel fence.<sup>37</sup> In addition, chain link and wire mesh can be used in the same fencing system.<sup>38</sup>

Panel frames are often, but not uniformly, produced with structural steel tubing that is 1.375 inches in diameter, with lengths of tube extending beyond the frame to be fitted into the vertical tubes or pins of temporary steel fence stands.<sup>39</sup> Temporary steel fencing panels may have one or more horizontal, vertical, or diagonal reinforcement tubes welded to the inside of the frame.<sup>40</sup>

Temporary steel fencing stands are shapes made of steel that stand flat on the ground and have one or two tubes or pins into which temporary steel fence panels are connected to stand erect. The stands may be made of welded steel tubing or may be a flat steel plate with one or two tubes or pins welded onto the plate for connecting the panels.<sup>41</sup> The stands with two tubes or pins serve to connect temporary fence panels together in a perimeter or

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<sup>31</sup> Conference transcript, p. 61 (Walters); hearing transcript, pp. 42 (Drake), 134 (Cochran).

<sup>32</sup> Petitioner's Response to Commerce's Supplemental Questions (public version), p. 1.Supp.2.

<sup>33</sup> Hearing transcript, pp. 34, 46 (Walters), p. 113 (Greer).

<sup>34</sup> Conference transcript, p. 37 (Drake).

<sup>35</sup> 90 FR 40332, August 19, 2025; Petitioner's Response to Commerce's Second Supplemental Questions, Exhibit 1.4.Supp.2.

<sup>36</sup> Conference transcript, pp. 50 to 51 (Drake).

<sup>37</sup> Conference transcript, p. 32 (Drake).

<sup>38</sup> Conference transcript, p. 65 (Drake); hearing transcript, pp. 6 (Drake), 16 (Van Kesteren), 43 (Walters).

<sup>39</sup> Petitioner's Response to Commerce's Supplemental Questions, p. 1.Supp.8.

<sup>40</sup> Petitioner's Response to Commerce's Second Supplemental Questions, Exhibit 1.4.Supp.2.

<sup>41</sup> Petitioner's Response to Commerce's Second Supplemental Questions, Exhibit 1.4.Supp.2.

enclosure, as the end of one panel is connected to one pin or tube of the stand, and the end of the next panel is connected to the second pin or tube of the same stand.<sup>42</sup> Figure 1.3 shows temporary steel fencing stands.

**Figure 1.3: Temporary steel fencing stands**



Source: Petitioner's Response to Commerce's Supplemental Questions (public version), Exhibit 1.19Supp.

Temporary steel fence stands are typically rectangular or oval with square or rounded edges. Stands made of steel tube typically have a tube welded across the base onto which the vertical tubes or pins are welded. Stands made of a flat steel plate have the vertical tubes or pins welded to the plate. Temporary steel fence stand bases are typically, but not uniformly, 28 to 37 inches long and 15 to 19 inches wide. The vertical tubes of temporary steel fence stands are of a diameter that permits them to receive the ends of temporary steel fence panels, and the vertical pins are of a diameter that permits them to insert into the end of temporary steel fence panels.<sup>43</sup>

## Manufacturing processes

The manufacturing of temporary steel fencing begins with hollow structural steel tubes and steel wire.<sup>44</sup> These inputs are usually pre-galvanized, which means that the tubes and wire are galvanized before delivery to the production site. Temporary steel fencing can be galvanized after assembly; however, this results in a heavier product and creates supply chain challenges during production.<sup>45</sup>

To produce temporary steel fencing panels, hollow structural tubes are received by the production facility, bent into shape, and welded together to produce the frame. Welding can be

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<sup>42</sup> Petitioner's Response to Commerce's Supplemental Questions (public version), p. 1.Supp.7.

<sup>43</sup> Petitioner's Response to Commerce's Supplemental Questions, p. 1.Supp.8.

<sup>44</sup> Petitioner's Response to Commerce's Supplemental Questions, p. 1.Supp.2.

<sup>45</sup> Conference transcript, p. 66 (Walters, van Kesteren).

done using either resistance welding or arc welding.<sup>46</sup> The tubes are cut to length before arriving at the production facility.<sup>47</sup> The steel wire is laced together to produce chain link or welded together to produce wire mesh to produce the interior of the temporary steel fencing panel.<sup>48</sup> Chain link is produced using a weaving machine<sup>49</sup> while wire mesh is produced in an automated resistance welding process.<sup>50</sup> The interior steel materials are then laced onto the frame or welded or tied to the frame.<sup>51</sup>

Tube stands are produced by bending and welding steel tube into a base, and then welding pins or tubes onto the base.<sup>52</sup> For flat steel plate stands, vertical tubes or pins are welded to the plate.<sup>53</sup>

There is no requirement that the steel used in temporary steel fencing be of any specific grade nor meet any specific ASTM standards. After assembly, temporary steel fencing may be hot dip galvanized, painted, and/or powder coated.<sup>54</sup>

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<sup>46</sup> In resistance welding, a current is passed through two pieces of metal, the metal resists that current and heats up, and the metal is melted together. Conference transcript, p. 68 (Walters). Arc welding uses an electrical current to create an electrical arc that melts metals on contact. Arc welding can add metal to join the two things being welded. Hearing transcript, p. 104 (Ivy). Tulsa Welding School, What is Arc Welding?, <https://www.tws.edu/blog/welding/what-is-arc-welding/>, accessed March 20, 2026.

<sup>47</sup> Conference transcript, p. 68 (Walters).

<sup>48</sup> Petitions, pp. 1.2 to 1.3.

<sup>49</sup> Conference transcript, p. 67 (Walters).

<sup>50</sup> Conference transcript, p. 68 (Walters).

<sup>51</sup> Conference transcript, p. 37 (Drake).

<sup>52</sup> Petitions, p. 1.2.

<sup>53</sup> Petitioner's Response to Commerce's Supplemental Questions (public version), p. 1.Supp.8.

<sup>54</sup> Petitioner's Response to Commerce's Supplemental Questions (public version), p. 1.Supp.2.

## Domestic like product issues

In the preliminary phase of these investigations, the Commission defined a single domestic like product, coextensive with the scope.<sup>55</sup> The petitioner proposes a single domestic like product that is coextensive with the scope.<sup>56</sup> In its comments on draft questionnaires, respondent Sonco Worldwide (“Sonco”) proposed (1) collecting data on animal enclosures and on perimeter fencing separately, as it argues that the Commission should define these products as separate like products, and (2) collecting production and operations data on out-of-scope “permanent” fencing, as Sonco argues there are no clear dividing lines between “temporary” and “permanent” fencing, therefore, it should be included in the domestic like product.<sup>57</sup> In its prehearing and posthearing briefs, Sonco only argued the first point – to define animal enclosures and perimeter fencing as separate like products.<sup>58</sup>

The Commission’s decision regarding the appropriate domestic product(s) that are “like” the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) common manufacturing facilities, production processes, and production employees; (5) customer and producer perceptions; and (6) price. Table 1.5 presents U.S. producers’, U.S. importers’, and U.S. purchasers’ rating counts for each domestic like product comparison factor comparing animal enclosure fencing (“animal enclosure TSF”) to other temporary steel fencing (“other TSF”).<sup>59</sup> <sup>60</sup>

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<sup>55</sup> Temporary Steel Fencing from China, Inv. Nos. 701-TA-754 and 731-TA-1732 (Preliminary), USITC Publication 5597, March 2025, p. 18.

<sup>56</sup> Petitioner’s posthearing brief, p. 1.

<sup>57</sup> Sonco’s comments on draft questionnaires, pp. 2 to 8. The Commission implemented Sonco’s request to collect questionnaire data on animal enclosures and on other fencing separately but did not implement Sonco’s request to collect questionnaire data on the production and operations of out-of-scope “permanent” fencing, as Sonco did not provide a definition for “permanent fencing.”

<sup>58</sup> Respondent Sonco’s prehearing brief, pp. 3 to 14, and posthearing brief, pp. 1 to 2.

<sup>59</sup> Commission questionnaires defined “animal enclosure fencing” as “temporary steel fencing included in the scope of the investigations that is designed to establish a free-standing enclosure for animals. Animal enclosure fencing is typically sold as a kit that contains at least four fence panels, including a panel with hinges or a hinged door and intended to be assembled by the consumer.” The Commission defined “other temporary steel fencing” as temporary steel fencing included in the scope of these investigations other than animal enclosure fencing.”

<sup>60</sup> See appendix D for firms’ narrative responses regarding the domestic like product analysis.

**Table 1.5 Temporary steel fencing: Count of U.S. producers', U.S. importers', and U.S. purchasers' responses to the domestic like product comparison factors comparing animal enclosure TSF to other TSF**

	Firm type	Fully	Mostly	Somewhat	Never
Physical characteristics	U.S. producers	1	2	3	1
Interchangeability	U.S. producers	1	1	3	2
Manufacturing	U.S. producers	1	2	3	1
Channels	U.S. producers	2	2	1	0
Perceptions	U.S. producers	1	2	3	1
Price	U.S. producers	1	2	1	1
Physical characteristics	Importers	2	0	3	3
Interchangeability	Importers	2	0	3	3
Manufacturing	Importers	2	2	1	3
Channels	Importers	2	1	1	3
Perceptions	Importers	1	1	0	5
Price	Importers	1	0	2	3
Physical characteristics	Purchasers	1	0	1	3
Interchangeability	Purchasers	1	0	1	3
Manufacturing	Purchasers	1	2	0	1
Channels	Purchasers	1	1	2	1
Perceptions	Purchasers	1	0	0	4
Price	Purchasers	1	0	1	2

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

## Physical characteristics and uses

A majority of firms reported that animal enclosure TSF and other TSF are somewhat or never/not-at-all comparable (4 of 7 U.S. producers, 6 of 8 U.S. importers, and 4 of 5 U.S. purchasers). \*\*\* noted several differences, including (1) animal enclosure TSF is made with lighter and less durable materials than other TSF, (2) animal enclosure TSF must be transported vertically while other TSF can be stacked, (3) animal enclosure TSF has a rounded top corner with only two welds, while other TSF has four welded corners, and (4) the two products have different end uses.

## Interchangeability

A majority of respondents reported that animal enclosure TSF and other TSF are somewhat or never comparable (5 of 7 U.S. producers, 6 of 8 U.S. importers, and 4 of 5 U.S. purchasers). \*\*\* noted that animal enclosure TSF is not accepted for standard temporary fencing jobs due to added components and different geometry, while \*\*\* noted that other TSF could be used as an animal enclosure TSF, but would be missing the door, while animal enclosure TSF could be used as a fence, but would have additional parts left over.

## Channels of distribution

A majority of U.S. producers (4 of 5) reported that the channels of distribution for animal enclosure TSF and other TSF are fully or mostly comparable, while a majority of U.S. importers (4 of 7) and U.S. purchasers (3 of 5) reported that they are somewhat or never comparable. Several respondents noted that animal enclosure TSF tends to be sold to retailers, while other TSF tends to be sold to contractors or rental fence companies. However, some respondents noted that both products are sold to retailers and that distributors will often carry both products. Table 1.6 presents U.S. producers' U.S. shipments of animal enclosure TSF versus other TSF, by channel of distribution. As shown, the majority (over 80 percent) of U.S. producers' U.S. shipments of animal enclosure TSF goes to retailers, while a plurality of U.S. producers' U.S. shipments of other TSF goes to rental companies. Distributors were the second most common channel of distribution for both animal enclosure TSF and other TSF (with the exception of the year 2023, during which end users were the second most common channel of distribution for other TSF).

**Table 1.6 Temporary steel fencing: U.S. producers' U.S. shipments of animal enclosure TSF versus other TSF, by channel of distribution and period**

Share in percent; interim period is January through June

Product type	Channel	2022	2023	2024	Interim 2024	Interim 2025
Animal enclosure TSF	Distributors	***	***	***	***	***
Animal enclosure TSF	Rental companies	***	***	***	***	***
Animal enclosure TSF	Retailers	***	***	***	***	***
Animal enclosure TSF	End users	***	***	***	***	***
Other TSF	Distributors	***	***	***	***	***
Other TSF	Rental companies	***	***	***	***	***
Other TSF	Retailers	***	***	***	***	***
Other TSF	End users	***	***	***	***	***

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

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

## Customer and producer perceptions

A majority of respondents reported that animal enclosure TSF and other TSF are somewhat or never/not-at-all comparable in terms of customer and producer perceptions (4 of 7 U.S. producers, 5 of 7 U.S. importers, and 4 of 5 U.S. purchasers). \*\*\* noted customers view dog kennels as higher-valued and more customized products. \*\*\* noted that the products are marketed in completely different styles, while \*\*\* noted that it uses different marketing teams for each product.

## Manufacturing facilities and production employees

Responses were mixed within each firm type as to whether manufacturing facilities and production employees are comparable between animal enclosure TSF and other TSF. \*\*\* noted that animal enclosure TSF and other TSF are built in the same factory but on different production lines, while \*\*\* reported that most manufacturing machines are similar, so a factory should be able to produce both products in the same facility. Several respondents noted that the main components are the same, but there are some manufacturing differences, such as curving the frame for animal enclosure TSF versus manufacturing an open bottom frame for other TSF to be placed on a stand, and animal enclosure TSF includes kit assembly parts such as doors, hinges, latches, and optional roof/partition components. Table 1.7 presents the number of responding firms and establishments<sup>61</sup> that produce animal enclosure TSF only, other TSF only, and both. As shown, 3 of 8 responding U.S. producers produce both, and 4 of 20 establishments produce both.

**Table 1.7 Temporary steel fencing: Count of U.S. producers' production of the domestic like product split by category at the firm and establishment level**

Count in number of firms reporting; share in percent

Product type	Count of firms	Share of firms	Count of establishments	Share of establishment
Animal enclosure TSF only	2	25.0	4	20.0
Other TSF only	3	37.5	12	60.0
Both animal enclosure and other TSF	3	37.5	4	20.0
All responses	8	100.0	20	100.0

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

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<sup>61</sup> The Commission's questionnaire requested that firms indicate for each establishment covered by the response whether animal enclosure TSF and/or other TSF are produced. The questionnaire defined "establishment" as each facility of a firm involved in the production of temporary steel fencing, including auxiliary facilities operated in conjunction with (whether or not physically separate from) such facilities.

## Price

The majority of U.S. importers (5 of 6) and purchasers (3 of 4) reported that price is somewhat or never/not-at-all comparable between animal enclosure TSF and other TSF, while a majority of U.S. producers (3 of 5) reported that price is always or usually comparable. \*\*\* reported that animal enclosure TSF is more expensive than other TSF, \*\*\* reported that other TSF is more expensive, and \*\*\* reported not being aware of price differences, stating that materials and manufacturing processes are the same. Table 1.8 presents the average unit values of U.S. producers' U.S. shipments by product type. As shown, average unit values for other TSF were higher than animal enclosure TSF throughout the data collection period, both including and not including other TSF stands.

**Table 1.8 Temporary steel fencing: Average unit value of U.S. producers' U.S. shipments with and without stands data, by the split like product types and period**

Unit value in dollars per pound; interim period is January through June

Product type	2022	2023	2024	Interim 2024	Interim 2025
Animal enclosure TSF	***	***	***	***	***
Other TSF	***	***	***	***	***
Animal enclosure TSF panels	***	***	***	***	***
Other TSF panels	***	***	***	***	***
Animal enclosure TSF stands	***	***	***	***	***
Other TSF stands	***	***	***	***	***

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

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



## Part 2: Conditions of competition in the U.S. market

### U.S. market characteristics

Temporary steel fencing consists of temporary fence panels and temporary fence stands that are connected to each other with hardware to make perimeters for construction sites and events, and as components in animal enclosures.<sup>1</sup> Most temporary steel fencing in the U.S. market is sold to rental companies that rent to the end user for a finite period after which the product is returned to the fleet and re-used. The remaining part of the market comprises distributors, retailers, and end users including construction companies, venues and arenas, and special events companies.<sup>2</sup>

\*\*\* of \*\*\* U.S. producers, eight of 16 importers, and \*\*\* of \*\*\* purchasers indicated that the market was subject to distinctive conditions of competition. Specifically, firms \*\*\* reported that the product longevity and lifecycle of the panels are important factors for customers ranging from fence rental companies to pet owners, with the latter often only buying “one or two (kennels and pet play pens) over the span of 10+ years.” U.S. producer \*\*\* reported that the fence rental industry is competitive due to “low barriers to entry.” Purchasers \*\*\* reported that demand follows trends in the construction industry.

Apparent U.S. consumption of temporary steel fencing declined from 2022 to 2024 but was higher in interim 2025 compared with interim 2024. The decline in apparent U.S. consumption from 2022 to 2024 for animal enclosure TSF was greater than the relatively smaller decline in apparent U.S. consumption of other TSF during the same period. Apparent U.S. consumption of animal enclosure TSF was lower in interim 2025 than in interim 2024, whereas the apparent U.S. consumption of other TSF was higher over the same comparison periods.

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<sup>1</sup> Hearing transcript, p. 14 (van Kesteren).

<sup>2</sup> Respondent Sonco’s posthearing brief, p. 5.

The Commission received \*\*\* usable questionnaire responses from firms that had purchased temporary steel fencing from January 2022 to June 2025.<sup>3 4 5</sup> The responding firms include fence rental companies (\*\*\*), distributors (\*\*\*), and retailers (\*\*\*). In general, responding U.S. purchasers were located in the Midwest, Central Southwest, West Coast, and in the Southeast. Large purchasers of temporary steel fencing include \*\*\*, \*\*\*, \*\*\*, \*\*\*, \*\*\*, and \*\*\*.

## Impact of section 301 tariffs, section 232 tariffs, and new or modified tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs, section 232 tariffs, and new or modified tariffs on overall demand, supply, prices, or raw material costs (tables 2.1 through 2.3). Firms most often reported impacts from section 232 tariffs and new or modified tariffs, with most importers reporting increased costs and prices as a result of the tariffs. Producer \*\*\* reported that increased import prices stemming from \*\*\* made domestic fencing “more competitive.” Firms including \*\*\* reported impacts on raw material prices from the section 232 tariffs. Regarding new or modified tariffs, purchaser \*\*\* reported the firm anticipates a limited impact on demand (from tariffs) due to customer preference for chain-link fencing. Purchaser \*\*\* reported that the tariffs have led to retail price increases.

**Table 2.1 Temporary steel fencing: Count of firms' responses regarding the impact of the section 301 tariffs on Chinese origin products**

Firm type	No	Yes	Don't know
U.S. producers	2	1	4
Importers	4	8	4
Purchasers	1	2	8

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

**Table 2.2 Temporary steel fencing: Count of firms' responses regarding the impact of the section 232 tariffs on steel and aluminum imports**

Firm type	No	Yes	Don't know
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<sup>3</sup> The following firms provided purchaser questionnaire responses: \*\*\*

<sup>4</sup> Of the \*\*\* responding purchasers, \*\*\* purchased the domestic temporary steel fencing, \*\*\* purchased imports of the subject merchandise from China, and \*\*\* purchased imports of temporary steel fencing from other sources.

<sup>5</sup> Seven purchasers indicated they had marketing/pricing knowledge of domestic product, seven of product from China, and five of product from nonsubject countries including Canada, Cambodia, Mexico, Thailand, and Vietnam.

U.S. producers	1	2	4
Importers	0	10	7
Purchasers	0	3	7

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

**Table 2.3 Temporary steel fencing: Count of firms' responses regarding the impact of new or modified tariffs**

Firm type	No	Yes	Don't know
U.S. producers	0	3	4
Importers	0	10	6
Purchasers	0	5	4

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

## Channels of distribution

U.S. producers sold somewhat evenly to rental companies, retailers, and distributors while importers sold mainly to end users and retailers as shown in table 2.4. Import from China were primarily sold to retailers in 2022, but by interim 2025, growing shares of sales were to rental companies and end users. Additional information regarding the channels of distribution for animal fencing and other fencing types is presented in appendix G.

**Table 2.4 Temporary steel fencing: Share of U.S. shipments by source, channel of distribution, and period**

Shares in percent; interim is January through June

<b>Source</b>	<b>Channel</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
United States	Distributors	***	***	***	***	***
United States	Rental companies	***	***	***	***	***
United States	Retailers	***	***	***	***	***
United States	End users	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	Rental companies	***	***	***	***	***
China	Retailers	***	***	***	***	***
China	End users	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	Rental companies	***	***	***	***	***
Nonsubject	Retailers	***	***	***	***	***
Nonsubject	End users	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	Rental companies	***	***	***	***	***
All imports	Retailers	***	***	***	***	***
All imports	End users	***	***	***	***	***

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

## Geographic distribution

U.S. producers and importers reported selling temporary steel fencing to all regions in the contiguous United States (table 2.5). For U.S. producers, \*\*\* percent of sales were within 100 miles of their production facility, \*\*\* percent were between 101 and 1,000 miles, and \*\*\* percent were over 1,000 miles. Importers sold \*\*\* percent within 100 miles of their U.S. point of shipment, \*\*\* percent between 101 and 1,000 miles, and \*\*\* percent over 1,000 miles.

**Table 2.5 Temporary steel fencing: Count of U.S. producers' and U.S. importers' geographic markets**

Region	U.S. producers	China
Northeast	4	9
Midwest	4	10
Southeast	4	11
Central Southwest	5	10
Mountain	4	11
Pacific Coast	4	12
Other	3	9
All regions (except Other)	4	8
Reporting firms	5	15

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

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

## Supply and demand considerations

### U.S. supply

Table 2.6 provides a summary of the supply factors regarding temporary steel fencing from U.S. producers. Domestic producers increased their capacity between 2022 and 2024, although capacity utilization decreased in this period. The ratio of domestic producers' inventories to total shipments increased over the period.

**Table 2.6 Temporary steel fencing: Supply factors that affect the ability to increase shipments to the U.S. market, by country and factor**

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

Factor	Measure	United States	China
Capacity 2022	Quantity	124,701	***
Capacity 2024	Quantity	140,606	***
Capacity utilization 2022	Ratio	56.3	***
Capacity utilization 2024	Ratio	37.5	***
Inventories to total shipments 2022	Ratio	***	***
Inventories to total shipments 2024	Ratio	***	***
Home market shipments 2024	Share	***	***
Non-US export market shipments 2024	Share	—	***
Ability to shift production	Count	***	***

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

Note: Responding U.S. producers accounted for over 90 percent of U.S. production of temporary steel fencing in 2024. The Commission received three questionnaire responses from foreign producers accounting for \*\*\* percent of Chinese production and \*\*\* percent of shipments to the United States, For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Parts 3 and 4.

### Domestic production

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

No producer reported having other export markets in 2025, but \*\*\* domestic producer \*\*\* reported \*\*\* of exports in \*\*\*. Other products that producers reportedly can produce on the same equipment as temporary steel fencing are tubular panels, wire filled gates, galvanized wire chain link fencing for commercial or residential uses, and farm related fencing products. Factors affecting U.S. producers’ ability to shift production include the time and costs for “change overs” to alter machine configurations as needed and forecasted demand for different products, as reported by producer \*\*\*. Producer \*\*\* stated that temporary steel fence panels are often a “convenience service” in larger projects that allows customers to supply the entire order from the firm, rather than needing to get the temporary panels from elsewhere.

## **Subject imports from China**

Based on available information, Chinese producers of temporary steel fencing have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced temporary steel fencing to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the large number and size of Chinese producers,<sup>6</sup> the increase in capacity between 2022 and 2024, lack of home market shipments, the ability to shift production to or from alternate products, and the ability of Chinese producers to shift shipments from alternate markets.

Other products that the responding Chinese producers reportedly can produce on the same equipment as temporary steel fencing include \*\*\*. The producers reported that their ability to shift between products is affected by \*\*\*.

## **Imports from nonsubject countries**

Nonsubject imports accounted for \*\*\* percent of total U.S. imports in 2024. Nonsubject sources of temporary steel fencing include Canada, Cambodia, Mexico, and Vietnam.

## **Supply constraints**

All responding U.S. producers and 10 out of 16 responding importers reported that they had not experienced supply constraints since January 1, 2022. Of those that reported they had experienced supply constraints, four importers reported that constraints occurred during 2022, one reported they occurred during 2023, no constraints were reported during 2024, and two reported that they occurred during 2025 (table 2.7). Constraints reported by importers included high costs of ocean transport and limited ocean shipping container availability. Importer \*\*\* reported these constraints led to the firm not being able to complete shipment commitments. Importer \*\*\* reported that high costs of ocean transport “peaked at \$20,000 per container,” which made it impractical to transport certain types of panel fencing. One importer \*\*\* reported that the petitions filed on January 15, 2025 resulted in specific supply constraints, describing that “the potential financial

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<sup>6</sup> Petitioner stated that subject producers are export-oriented and have a large production capacity; many subject producers are located in a county and province which have policies that promote wire mesh industries (including temporary steel fencing) to export. Petitioner’s postconference brief, p. 22.

impact of this investigation required (the firm) to stop producing temporary steel fence at (its) existing suppliers who were located in China.”

Two of nine responding purchasers reported that they had experienced supply constraints, reporting supply constraints from domestic producers in 2023, 2024, and 2025, and from foreign producers or importers in 2022 and 2025. Constraints purchasers experienced from domestic producers were shipping issues and capacity constraints on certain products, leading to delays in receiving orders. The purchasers reported experiencing shipment delays from shipping lines being “backed up” and workforce impacts related to COVID-19. One purchaser, \*\*\*, reported that after the filing of the petitions, importers were unable to fulfill orders and U.S. producers were unable to meet this new demand, specifically on powder-coated kennels, no-dig yard fence, and permanent fence gate products.

**Table 2.7 Temporary steel fencing: Count of firms’ responses regarding timing of supply constraints, by firm type and period**

Period of constraint	U.S producers	Importers	Purchasers: Domestic	Purchasers: Foreign/imported
2022	0	4	0	1
2023	0	1	1	0
2024	0	0	1	0
2025	0	2	1	1

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

### **New suppliers**

\*\*\* purchasers indicated that new suppliers entered the U.S. market since January 1, 2022. The reported new suppliers are firms in the United States \*\*\*, Canada and Mexico.

### **U.S. demand**

Based on available information, the overall demand for temporary steel fencing is likely to experience small changes in response to changes in price. The main contributing factor is the limited availability of substitute products.

### **End uses and cost share**

U.S. demand for temporary steel fencing depends on the demand for its end use applications. Reported end uses include perimeter control for construction sites, event security, dog kennels, and backyard poultry operations.

Regarding the cost shares for fence rental companies, \*\*\* customer \*\*\* reported that fence panels account for \*\*\* of the total rental costs.<sup>7</sup>

### Business cycles

Six of seven U.S. producers, ten of sixteen importers, and six of nine purchasers indicated that the market was subject to business cycles. Specifically, firms reported that demand follows the seasonality of the construction industry, and as such it is higher during the spring and summer months.

### Demand trends

Firms' responses regarding demand trends for temporary steel fencing since January 1, 2022 were mixed, as shown in table 2.8. A plurality of importers reported an increase in U.S. demand for temporary steel fencing, although several also reported a decrease in demand. Most U.S. producers reported a decrease in U.S. demand for temporary steel fencing. \*\*\* reported that overall demand increased in 2025 due to increased demand from site services companies. Importer \*\*\* reported that demand for fencing for animal enclosures (coops and kennels) has increased since January 1, 2022; other firms have reported the demand for fencing for animal enclosures increased in the aftermath of the COVID-19 pandemic. The majority of purchasers reported that domestic and foreign demand had fluctuated upward or remained constant.

**Table 2.8 Temporary steel fencing: Count of firms' responses regarding overall domestic and foreign demand, by firm type**

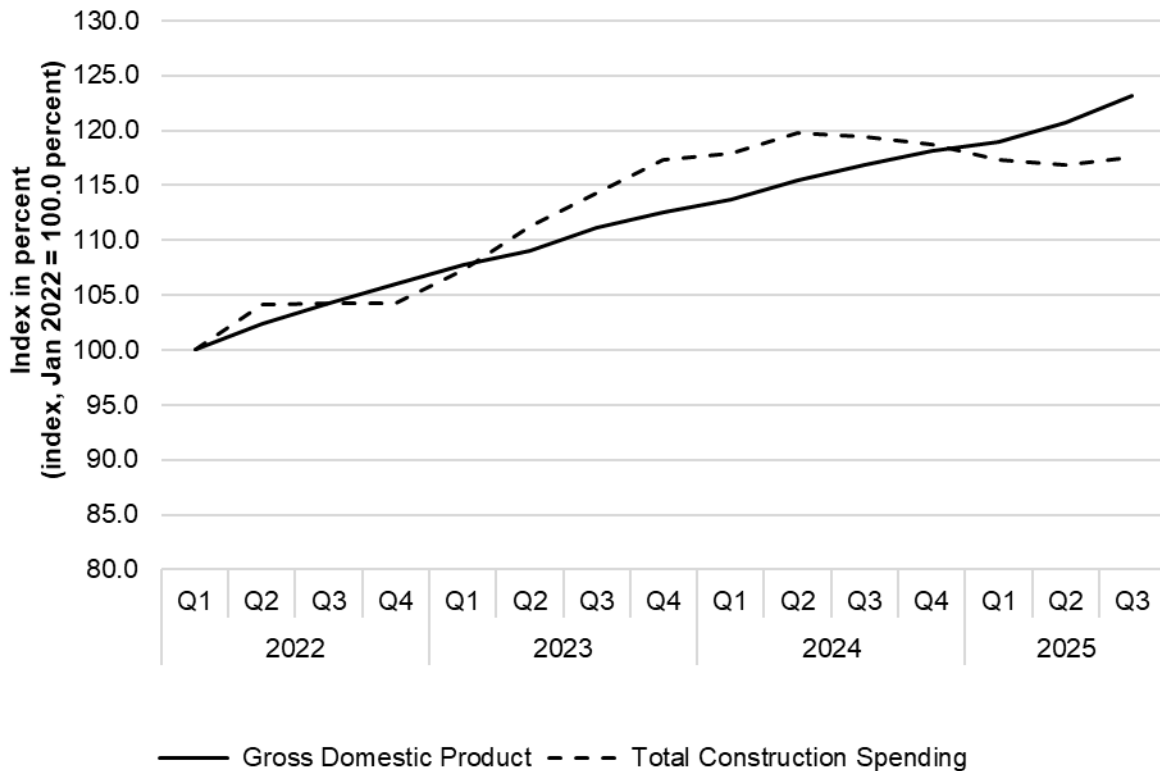
Market	Firm type	Steadily increase	Fluctuate upward	No change	Fluctuate downward	Steadily decrease
Domestic demand	U.S. producers	1	1	1	4	0
Domestic demand	Importers	5	2	2	4	2
Domestic demand	Purchasers	0	3	5	0	1
Foreign demand	U.S. producers	0	0	1	2	0
Foreign demand	Importers	1	0	1	2	1
Foreign demand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

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

<sup>7</sup> Respondent Sonco's posthearing brief, pg. A.28.

Demand for temporary steel fencing is also connected to the demand for site services (including portable restrooms, trailers, and dumpsters). Importers reported that large site service companies have added temporary steel fencing offerings, with \*\*\* adding that site services “go hand in hand” with temporary steel fencing. In addition, firms reported that demand for temporary steel fencing is driven by fluctuations in construction. As shown in figure 2.1 and related tables 2.9 and 2.10, overall economic growth and construction spending have increased since January 2022.

**Figure 2.1 Temporary steel fencing: Demand drivers: Gross domestic product and total construction spending indices, by quarter**



Source: U.S. Bureau of Economic Analysis, Gross Domestic Product (GDP), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/GDP>, December 30, 2025 and U.S. Census Bureau, Total Construction Spending: Total Construction in the United States (TTLCONS), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/TTLCONS>, December 30, 2025.

**Table 2.9 Temporary steel fencing: Demand drivers: Gross domestic product index, by quarter**

Index in percent, 2022 Q1 = 100.0 percent

Quarter	2022	2023	2024	2025
Q1	100.0	107.8	113.7	119.0
Q2	102.4	109.0	115.4	120.7
Q3	104.3	111.2	116.9	123.1
Q4	106.0	112.6	118.1	N/A.

Source: U.S. Bureau of Economic Analysis, Gross Domestic Product (GDP), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/GDP>, December 30, 2025.

**Table 2.10 Temporary steel fencing: Demand drivers: Total construction spending index, by quarter**

Index in percent, 2022 Q1 = 100.0 percent

Quarter	2022	2023	2024	2025
Q1	100.0	107.3	117.9	117.3
Q2	104.1	111.2	119.8	116.9
Q3	104.2	114.3	119.4	117.6
Q4	104.2	117.3	118.8	N/A

Source: U.S. Census Bureau, Total Construction Spending: Total Construction in the United States (TTLCONS), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/TTLCONS>, December 30, 2025.

### Substitute products

Substitutes for temporary steel fencing are limited. No responding U.S. producers reported any substitute products for temporary steel fencing, while only \*\*\* reported a substitute product.

### Substitutability issues

This section assesses the degree to which U.S.-produced temporary steel fencing and imports of temporary steel fencing from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of temporary steel fencing from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate degree of substitutability between domestically produced temporary steel fencing and temporary steel fencing imported from subject sources.<sup>8</sup> Factors contributing to this level of substitutability include differences between domestically produced temporary steel fencing and temporary steel fencing imported from subject sources across multiple purchase factors and significant factors other than price that firms consider. Factors reducing substitutability include different lead times from domestic and subject sources, high freight costs, availability of nonsubject sources of temporary steel fencing and some instances of domestic content requirements. In addition, for most of the factors that

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<sup>8</sup> The degree of substitution between domestic and imported temporary steel fencing depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced temporary steel fencing to the temporary steel fencing imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

purchasers rated as “very important” in table 2.13, the U.S. product was rated as comparable or inferior when compared to subject merchandise from China (table 2.17).

## Factors affecting purchasing decisions

### Purchaser decisions based on source

As shown in table 2.11, most purchasers and their customers sometimes or never make purchasing decisions based on the producer or country of origin. The purchaser that reported that it always makes decisions based on the manufacturer, reported that the firm is unable to purchase temporary steel fencing from U.S. producers as they do not offer the specifications the purchaser’s customers require.

**Table 2.11 Temporary steel fencing: Count of purchasers’ responses regarding frequency of purchasing decisions based on producer and country of origin**

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	2	0	3	5
Customer	Producer	0	1	3	4
Purchaser	Country	2	0	2	6
Customer	Country	0	1	2	5

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

### Importance of purchasing domestic product

Most purchasers reported that most or all of their purchases did not require purchasing U.S.-produced product. One purchaser reported that for limited customers, domestic product was preferred or required, such as in the case of public sector projects.

### Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for temporary steel fencing were quality (seven firms), price/cost (five firms), compliance/technical specs/patents (four firms), and availability/supply (four firms), as shown in table 2.12. Compliance/technical specs/patent was most frequently cited first-most important factor (four firms). Availability/supply was most often cited as the second-most important factor (cited by three firms), and price and quality were most often cited as the third-most important factors (three firms each).

**Table 2.12 Temporary steel fencing: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor**

Factor	First	Second	Third	Total
Availability / Supply	2	3	0	4
Compliance / Technical specs / Patent	4	2	1	4
Quality	2	2	3	7
Assortment / Capabilities	0	1	1	1
Price / Cost	1	1	3	5
All other factors	1	1	1	NA

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

Note: All other factors include product, time, and customer service/support. The sum of responses in each row may not add up to the total number of responding firms as some firms selected more than one importance rating for a given factor.

Half the responding purchasers (five out of ten) reported that they only sometimes purchase the lowest-priced product.

### **Importance of specified purchase factors**

Purchasers were asked to rate the importance of 21 factors in their purchasing decisions (table 2.13). The factors rated as very important by more than half of responding purchasers were product consistency (nine firms), availability (eight firms), quality meets industry standards (eight firms), reliability of supply (eight firms), fence type (eight firms), durability (seven firms), delivery time (five firms), compatibility with existing fleet (five firms), and price (five firms).

**Table 2.13 Temporary steel fencing: Count of purchasers' responses regarding importance of purchase factors, by factor**

Factor	Very important	Somewhat important	Not important
Product consistency	9	1	0
Reliability of supply	8	2	0
Fence type (e.g., chain link, mesh)	8	2	0
Availability	8	2	0
Quality meets industry standards	8	2	0
Durability	7	3	0
Delivery time	5	5	0
Compatibility with existing fleet	5	4	1
Price	5	5	0
Delivery terms	4	5	1
Safety requirements	3	6	1
Quality exceeds industry standards	3	5	2
Discounts offered	3	5	2
Product range	3	3	4
Payment terms	3	4	3
Ability to repair	4	2	4
Ease of loading and unloading	2	7	1
Packaging	2	6	2
U.S. transportation costs	2	6	2
Minimum quantity requirements	1	7	2
Technical support/service	1	4	5

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

### Repair capability

Purchasers were asked whether their firms are able to repair temporary steel fencing, and to identify the technical requirements and costs of repair. As shown in table 2.14, three firms reported the ability to repair chain link fencing, but at a high cost. No firm reported the ability to repair wire mesh fences.

**Table 2.14 Temporary steel fencing: Count of U.S. purchasers' responses regarding repair capability, by product**

Type of purchases	No	Yes
Repair capability: Chain link	7	3
Repair capability: Wire mesh	10	0

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

## Lead times

Temporary steel fencing produced in the United States is somewhat evenly produced to order and sold from inventory. U.S. producers and importers reported that 47.1 and 24.1 percent of their commercial shipments were produced-to-order, respectively, with lead times averaging 16 days for U.S. producers and 90 days for U.S. importers. For U.S. producers and U.S. importers, 52.9 and 46.7 percent of their commercial shipments came from U.S. inventories, respectively, with lead times averaging 13 days for U.S. producers and 4 days for U.S. importers. Importers sold 29.2 percent from foreign inventories, with an average lead time of 111 days.

## Supplier certification

Two out of ten responding purchasers require their suppliers to become certified or qualified to sell temporary steel fencing to their firm. Purchasers reported that the time to qualify a new supplier ranged from seven to thirty days. No purchaser reported that domestic or foreign suppliers had failed in attempts to qualify temporary steel fencing or had lost their approved status since 2022.

## Minimum quality specifications

As presented in table 2.15, five responding purchasers reported that domestically produced temporary steel fencing always met minimum quality specifications. Five responding purchasers reported that the temporary steel fencing imported from China always met minimum quality specifications.

**Table 2.15 Temporary steel fencing: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source**

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't know
United States	5	0	1	1	3
China	5	1	0	0	4
Nonsubject sources	0	2	0	0	7

Source: Compiled from data submitted in response to Commission questionnaires. Note: Purchasers were asked how often domestically produced or imported temporary steel fencing meets minimum quality specifications for their own or their customers' uses.

Eight responding purchasers reported factors that determined quality as material or production quality, consistency across panels, dimensions, stability, packaging, ease of setup, product longevity, galvanization, powder-coating consistency, repairability, wire and tube gauge, and meeting Consumer Product Safety Commission ("CPSC") or Building Officials and Code Administrators ("BOCA") requirements.

## Changes in purchasing patterns

Six purchasers reported that they had changed suppliers since January 1, 2022, while four reported that they had not. Specifically, one firm (\*\*\*) dropped purchases from China because of tariffs. Another firm (\*\*\*) added new suppliers to expand its product offerings with panels of different appearances as needed for certain applications. Purchaser \*\*\* reported that Davis Gate & Wire was added as a new supplier of chain link kennels, however, it was unable to fully meet demand. Purchaser \*\*\* reported it often searches for new suppliers, and added that some have gone out of business.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2022 (table 2.16). The majority of responding purchasers reported that purchases from U.S. producers fluctuated up or remained constant, while most purchases of product imported from China fluctuated down or remained constant. Purchasers reported fluctuating purchases of U.S.-produced product because increased freight costs caused imports to decrease. Purchasers reported decreased purchases of product from China fencing because of tariffs and the availability of nonsubject sources. Purchaser \*\*\* reported decreased purchases of product from all sources because of an overall decrease in demand for temporary steel fencing. Purchaser \*\*\* reported that purchases from China and nonsubject sources had previously been fluctuating up, but that “tariffs have impacted this downward trend.”

**Table 2.16 Temporary steel fencing: Count of purchasers’ responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries**

Source of purchases	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease	Did not purchase
United States	0	3	2	2	0	1
China	0	1	1	3	1	1
All other sources	0	1	2	1	0	4
Sources unknown	0	0	2	0	0	6

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

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

Purchasers were asked a number of questions comparing temporary steel fencing produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 21 factors (table 2.13) for which they were asked to rate the importance.

As shown on table 2.17, the majority of responding purchasers reported that U.S.-produced temporary steel fencing was comparable or inferior to Chinese temporary steel fencing with respect to all purchasing factors, except on delivery time. Purchasers reported that U.S.-produced temporary steel fencing and nonsubject temporary steel fencing were comparable on most factors except on delivery time. A majority of purchasers reported that Chinese temporary steel fencing is comparable to temporary steel fencing from nonsubject countries with respect to most purchasing factors.

**Table 2.17 Temporary steel fencing: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Factor	Country pair	Superior	Comparable	Inferior
Product consistency	U.S. vs China	0	2	2
Reliability of supply	U.S. vs China	0	2	2
Fence type (e.g., chain link, mesh)	U.S. vs China	0	2	2
Availability	U.S. vs China	1	0	3
Quality meets industry standards	U.S. vs China	0	2	2
Durability	U.S. vs China	0	2	2
Delivery time	U.S. vs China	2	1	1
Compatibility with existing fleet	U.S. vs China	0	1	3
Price	U.S. vs China	0	3	1
Delivery terms	U.S. vs China	0	2	2
Safety requirements	U.S. vs China	0	3	0
Quality exceeds industry standards	U.S. vs China	0	2	2
Discounts offered	U.S. vs China	0	4	0
Product range	U.S. vs China	0	1	3
Payment terms	U.S. vs China	1	4	0
Ability to repair	U.S. vs China	0	1	3
Ease of loading and unloading	U.S. vs China	0	3	1
Packaging	U.S. vs China	0	3	1
U.S. transportation costs	U.S. vs China	0	5	0
Minimum quantity requirements	U.S. vs China	0	3	1
Technical support/service	U.S. vs China	0	3	1

Table continued.

**Table 2.17 (Continued) Temporary steel fencing: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Product consistency	U.S. vs Nonsubject sources	0	2	0
Reliability of supply	U.S. vs Nonsubject sources	0	2	0
Fence type (e.g., chain link, mesh)	U.S. vs Nonsubject sources	0	1	1
Availability	U.S. vs Nonsubject sources	1	0	1
Quality meets industry standards	U.S. vs Nonsubject sources	0	2	0
Durability	U.S. vs Nonsubject sources	0	2	0
Delivery time	U.S. vs Nonsubject sources	2	0	0
Compatibility with existing fleet	U.S. vs Nonsubject sources	0	1	1
Price	U.S. vs Nonsubject sources	0	1	1
Delivery terms	U.S. vs Nonsubject sources	0	2	0
Safety requirements	U.S. vs Nonsubject sources	0	2	0
Quality exceeds industry standards	U.S. vs Nonsubject sources	0	2	0
Discounts offered	U.S. vs Nonsubject sources	0	2	0
Product range	U.S. vs Nonsubject sources	0	2	0
Payment terms	U.S. vs Nonsubject sources	0	3	0
Ability to repair	U.S. vs Nonsubject sources	0	1	1
Ease of loading and unloading	U.S. vs Nonsubject sources	0	2	0
Packaging	U.S. vs Nonsubject sources	0	2	0
U.S. transportation costs	U.S. vs Nonsubject sources	0	3	0
Minimum quantity requirements	U.S. vs Nonsubject sources	0	2	0
Technical support/service	U.S. vs Nonsubject sources	0	2	0

Table continued.

**Table 2.17 (Continued) Temporary steel fencing: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

<b>Factor</b>	<b>Country pair</b>	<b>Superior</b>	<b>Comparable</b>	<b>Inferior</b>
Product consistency	China vs Nonsubject sources	1	3	0
Reliability of supply	China vs Nonsubject sources	1	3	0
Fence type (e.g., chain link, mesh)	China vs Nonsubject sources	1	3	0
Availability	China vs Nonsubject sources	1	2	0
Quality meets industry standards	China vs Nonsubject sources	1	3	0
Durability	China vs Nonsubject sources	1	3	0
Delivery time	China vs Nonsubject sources	0	4	0
Compatibility with existing fleet	China vs Nonsubject sources	1	3	0
Price	China vs Nonsubject sources	1	3	1
Delivery terms	China vs Nonsubject sources	1	3	0
Safety requirements	China vs Nonsubject sources	1	3	0
Quality exceeds industry standards	China vs Nonsubject sources	1	3	0
Discounts offered	China vs Nonsubject sources	0	4	0
Product range	China vs Nonsubject sources	1	3	0
Payment terms	China vs Nonsubject sources	0	5	0
Ability to repair	China vs Nonsubject sources	1	3	0
Ease of loading and unloading	China vs Nonsubject sources	1	3	0
Packaging	China vs Nonsubject sources	1	3	0
U.S. transportation costs	China vs Nonsubject sources	0	4	0
Minimum quantity requirements	China vs Nonsubject sources	1	3	0
Technical support/service	China vs Nonsubject sources	1	3	0

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

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

## Comparison of U.S.-produced and imported temporary steel fencing

In order to determine whether U.S.-produced temporary steel fencing can generally be used in the same applications as imports from China, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table 2.18, most U.S. producers and importers reported that domestically-produced temporary steel fencing and imports from China are always or frequently interchangeable. In addition, the Commission requested that firms compare different temporary steel fence product types, as shown in table 2.19. Regarding product type interchangeability, \*\*\* added that “(it) is limited to chain link panels that match spec and hardware across origins. Differences in tube size/gauge, mesh/fabric gauge, coating, coupler/foot compatibility, or gate accessories will prevent interchangeability. Welded wire is never substituted into chain link applications (or vice versa) for durability/repair, compatibility, and customer fleet consistency reasons.” In addition, \*\*\* reported that the preference for different temporary steel fence product types depends on the end user; for its rental company customers, \*\*\* of its sales in 2025 were for chain link products.<sup>9</sup>

**Table 2.18 Temporary steel fencing: Count of firms reporting the interchangeability between product produced in the United States and in other countries, by country pair and firm type**

Country pair	Firm type	Always	Frequently	Sometimes	Never
United States vs. China	U.S. producers	1	3	1	0
United States vs. Other	U.S. producers	1	2	1	0
China vs. Other	U.S. producers	1	1	1	0
United States vs. China	Importers	4	4	3	2
United States vs. Other	Importers	3	4	2	1
China vs. Other	Importers	4	3	2	1
United States vs. China	Purchasers	0	0	3	0
United States vs. Other	Purchasers	0	0	2	0
China vs. Other	Purchasers	0	1	1	0

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

<sup>9</sup> Respondent Sonco’s posthearing brief, p. A.21.

**Table 2.19 Temporary steel fencing: Count of firms reporting the interchangeability between product types, by product pair and firm type**

Product pair	Firm type	Always	Frequently	Sometimes	Never
Mesh vs. Chain	U.S. producers	1	2	3	0
Mesh vs. Other	U.S. producers	1	2	2	0
Chain vs. Other	U.S. producers	1	2	2	0
Mesh vs. Chain	Importers	1	2	6	3
Mesh vs. Other	Importers	1	2	4	3
Chain vs. Other	Importers	2	3	2	3
Mesh vs. Chain	Purchasers	0	0	1	2
Mesh vs. Other	Purchasers	0	0	0	1
Chain vs. Other	Purchasers	0	0	0	1

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of temporary steel fencing from the United States, subject countries, or nonsubject countries, as presented in table 2.20. Most importers reported quality, durability, and safety as important factors beyond price. For example, \*\*\* reported that ZND panels do not meet CPSC/BOCA requirements, \*\*\* reported that animal enclosure coatings must be rust-resistant, and \*\*\* reported that suppliers in China “have much greater quality... than other countries we have placed orders with (U.S., Vietnam, Mexico)”. Purchasers reported availability and lead times as important factors other than price, with \*\*\* reporting that “U.S. manufacturers have not been able to fully meet demand. Additionally, not all in-scope products are currently being produced in the U.S.”

**Table 2.20 Temporary steel fencing: Count of firms reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Country pair	Firm type	Always	Frequently	Sometimes	Never
United States vs. China	U.S. producers	0	1	2	1
United States vs. Other	U.S. producers	0	0	2	1
China vs. Other	U.S. producers	0	0	2	1
United States vs. China	Importers	5	4	4	1
United States vs. Other	Importers	3	3	3	1
China vs. Other	Importers	3	3	4	1
United States vs. China	Purchasers	2	1	0	0
United States vs. Other	Purchasers	0	1	0	0
China vs. Other	Purchasers	0	0	1	0

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

## **Elasticity estimates**

This section discusses elasticity estimates; parties were encouraged to comment on these estimates. Although parties provided additional comments regarding U.S. supply, U.S. demand, and product substitutability, parties did not provide comments addressing the specific elasticity estimates in the prehearing report.

### **U.S. supply elasticity**

The domestic supply elasticity for temporary steel fencing measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of temporary steel fencing. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced temporary steel fencing. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 6 to 10 is suggested.

### **U.S. demand elasticity**

The U.S. demand elasticity for temporary steel fencing measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of temporary steel fencing. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the temporary steel fencing in the production of any downstream products. Based on the available information, the aggregate demand for temporary steel fencing is likely to be inelastic; a range of -0.2 to -0.75 is suggested.

### **Substitution elasticity**

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.<sup>10</sup> Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information,

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<sup>10</sup> The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

the elasticity of substitution between U.S.-produced temporary steel fencing and imported temporary steel fencing is likely to be in the moderate range of 3 to 5. This is due to firm responses indicating that U.S.-produced temporary steel fencing does not always meet technical specifications or quality required by purchasers' customers and the importance of other factors above price as a consideration before purchasing.

## Part 3: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part 1 of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part 4 and Part 5. Information on the other factors specified is presented in this section and/or Part 6 and (except as noted) is based on the questionnaire responses of eight firms that accounted for an estimated \*\*\* percent of U.S. production of temporary steel fencing during 2024.<sup>1 2</sup>

### U.S. producers

The Commission issued a U.S. producer questionnaire to 10 firms based on information contained in the petitions and communications with firms. Eight firms provided usable data on their operations. Table 3.1 lists U.S. producers of temporary steel fencing, their production locations, positions on the petitions, and shares of total production.

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<sup>1</sup> \*\*\* did not submit questionnaire responses. \*\*\* estimated it produced \*\*\* pounds of temporary steel fencing in 2023. Email from \*\*\*, February 13, 2025. \*\*\* estimated it produced \*\*\* pounds of temporary steel fencing in 2024. Petitions, exh. 1.3. \*\*\* was unresponsive to staff's outreach attempts, so staff used its 2023 estimate to estimate 2024 production coverage.

<sup>2</sup> See Appendix E for U.S. producers' production, shipments, and employment data for animal enclosure TSF. See Appendix F for U.S. producers' production, shipments, and employment data for other TSF.

**Table 3.1 Temporary steel fencing: U.S. producers, their positions on the petitions, production locations, and shares of reported production, 2024**

Shares in percent

Firm	Position on petitions	Production location(s)	Share of production for animal enclosure TSF	Share of production for other TSF	Share of production for all TSF
American Fence	***	Phoenix, AZ Tucson, AZ Salt Lake City, UT Houston, TX Dallas, TX Orlando, FL	***	***	***
Behlen	***	Columbus, NE Baker City, OR McGregor, TX Omaha, NE	***	***	***
National	***	Sun Valley, CA Greenville, TX Charlotte, NC	***	***	***
Priefert	***	Mount Pleasant, TX	***	***	***
Stephens Pipe	Oppose	Russell Springs, KY	***	***	***
Tarter	***	Dunnville, KY Corrinne, UT	***	***	***
Viking	***	Austin, TX	***	***	***
ZND	Petitioner	Statesville, NC Madera, CA	***	***	***
All firms	Various	Various	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and hearing transcript, pp. 128 and 135 (Cochran).

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Table 3.2 presents information on U.S. producers' ownership, related and/or affiliated firms. As indicated in table 3.2, no U.S. producers are related to foreign producers of the subject merchandise and no U.S. producers are related to U.S. importers of the subject merchandise. As discussed in greater detail below, three U.S. producers directly imported temporary steel fencing from China and one purchased temporary steel fencing imported from China through U.S. importers.

**Table 3.2 Temporary steel fencing: U.S. producers' ownership, related and/or affiliated firms**

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

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

Table 3.3 presents events in the U.S. industry since January 1, 2022.

**Table 3.3 Temporary steel fencing: Important industry events since January 1, 2022**

Item	Firm	Event
Plant closure	Behlen	June 2023: Behlen closed its Omaha, Nebraska facility. The company stated that the assets from the Behlen plant would be relocated to the company's Columbus, Nebraska plant.
Plant opening	ZND	2022: ZND started production at its Madera, California facility.

Source: Behlen, Restructuring and closure of Omaha plant, June 16, 2023, <https://www.behlenmfg.com/news/restructuring-and-closure-of-omaha-plant>; petitions, p. 1.21.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of temporary steel fencing since 2022. Five of eight producers indicated in their questionnaires that they had experienced such changes. Table 3.4 presents the changes identified by these producers.

**Table 3.4 Temporary steel fencing: U.S. producers' reported changes in operations, since January 1, 2022**

<b>Item</b>	<b>Firm name and narrative response on changes in operations</b>
Plant openings	***
Plant closings	***
Plant closings	***
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***
Expansions	***
Expansions	***
Acquisitions	***
Other	***

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

## U.S. production, capacity, and capacity utilization

Table 3.5 presents U.S. producers' installed and practical capacity and production on the same equipment. Installed and practical overall capacity increased during the data collection period. Overall production on the same machinery decreased from 2022 to 2024, but was higher in interim 2025 than in interim 2024. Thus, both installed and practical overall capacity utilization decreased from 2022 to 2024 but were higher in interim 2025 than in interim 2024. Of the eight producers, \*\*\* had the highest installed overall capacity during the data collection period, followed by \*\*\*, which, together, accounted for over \*\*\* percent of installed overall capacity throughout the data collection period.

**Table 3.5 Temporary steel fencing: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period**

Capacity and production in 1,000 pounds; utilization in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	568,743	610,486	613,818	304,157	306,103
Installed overall	Production	159,047	147,523	147,473	87,313	94,701
Installed overall	Utilization	28.0	24.2	24.0	28.7	30.9
Practical overall	Capacity	259,110	283,520	285,985	142,564	144,121
Practical overall	Production	159,047	147,523	147,473	87,313	94,701
Practical overall	Utilization	61.4	52.0	51.6	61.2	65.7
Practical temporary steel fencing	Capacity	124,701	144,614	140,606	71,141	71,438
Practical temporary steel fencing	Production	70,226	57,060	52,718	28,146	30,012
Practical temporary steel fencing	Utilization	56.3	39.5	37.5	39.6	42.0

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

Table 3.6 presents U.S. producers' reported narratives regarding practical capacity constraints.

**Table 3.6 Temporary steel fencing: U.S. producers' reported capacity constraints since January 1, 2022**

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

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

Table 3.7 and figure 3.1 present U.S. producers' production, capacity, and capacity utilization. Practical temporary steel fencing capacity increased irregularly from 2022 to 2024,<sup>3</sup> and was higher in interim 2025 than in interim 2024. U.S. producers' production decreased from 2022 to 2024 but was higher in interim 2025 than in interim 2024.<sup>4</sup> Capacity utilization decreased from 2022 to 2024, as capacity increased and production decreased, but capacity utilization was higher in interim 2025 than in interim 2024. While \*\*\* accounted for the largest share of practical capacity throughout the data collection period, \*\*\* accounted for the largest share of production throughout the data collection period, followed by \*\*\*.

**Table 3.7 Temporary steel fencing: U.S. producers' output, by firm and period**

**Practical capacity**

Capacity in 1,000 pounds; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	124,701	144,614	140,606	71,141	71,438

Table continued.

<sup>3</sup> The increase in practical temporary steel fencing capacity from 2022 to 2024 was due to \*\*\*.

<sup>4</sup> \*\*\* of the eight U.S. producers' production decreased from 2022 to 2024. The higher level of production in interim 2025 than in interim 2024 was driven by \*\*\*, while \*\*\* of eight U.S. producers reported lower levels of production in interim 2025 than in interim 2024.

**Table 3.7 (Continued) Temporary steel fencing: U.S. producers' output, by firm and period**  
**Production**

Production in 1,000 pounds; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	70,226	57,060	52,718	28,146	30,012

Table continued.

**Table 3.7 (Continued) Temporary steel fencing: U.S. producers' output, by firm and period**  
**Capacity utilization**

Capacity utilization in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	56.3	39.5	37.5	39.6	42.0

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

Table continued.

**Table 3.7 (Continued) Temporary steel fencing: U.S. producers' output, by firm and period**

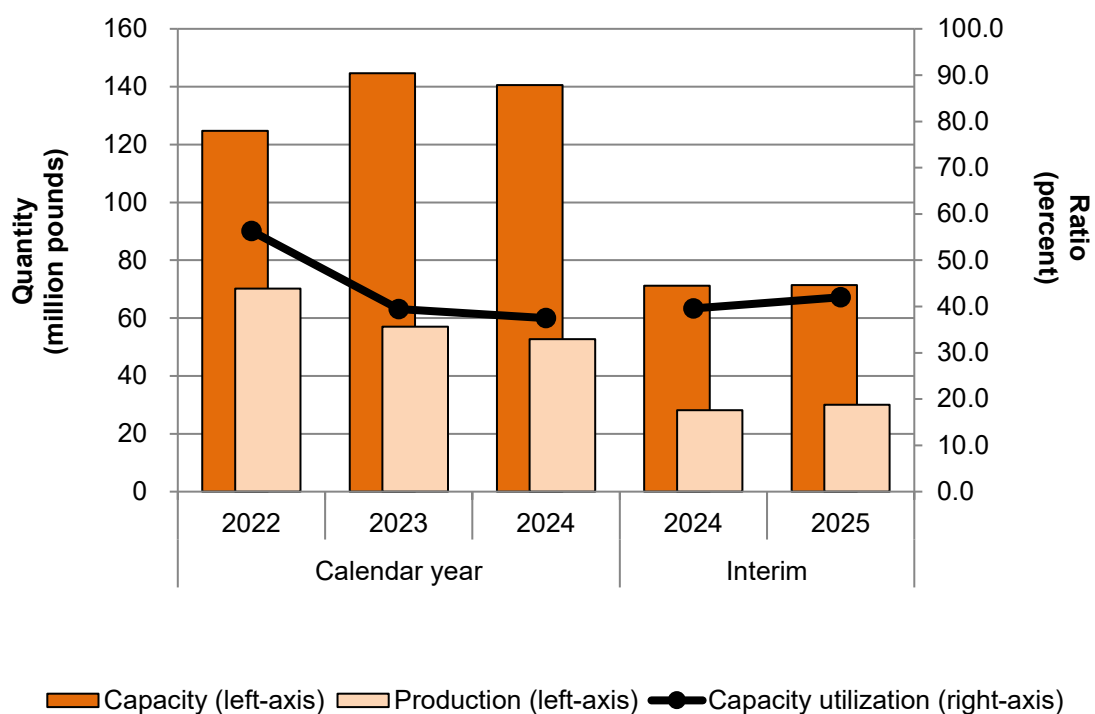
**Share of production**

Share in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

**Figure 3.1 Temporary steel fencing: U.S. producers' output, by period**



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

## Alternative products

As shown in table 3.8, the share of overall production held by the production of temporary steel fencing decreased from 44.2 percent in 2022 to 35.7 percent in 2024 and was lower in interim 2025 than in interim 2024. Three firms reported producing other products using the same machinery and employees as temporary steel fencing, including \*\*\*.

**Table 3.8 Temporary steel fencing: U.S. producers' overall production on the same equipment as in-scope production, by period**

Quantity in 1,000 pounds; ratio and share in percent; interim is January through June

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
Animal enclosures	Quantity	***	***	***	***	***
Other TSF	Quantity	***	***	***	***	***
All temporary steel fencing	Quantity	70,226	57,060	52,718	28,146	30,012
Other products	Quantity	88,821	90,463	94,755	59,167	64,689
All products	Quantity	159,047	147,523	147,473	87,313	94,701
Animal enclosures	Share 1	***	***	***	***	***
Other TSF	Share 1	***	***	***	***	***
All temporary steel fencing	Share 1	44.2	38.7	35.7	32.2	31.7
Other products	Share 1	55.8	61.3	64.3	67.8	68.3
All products	Share 1	100.0	100.0	100.0	100.0	100.0
Animal enclosures	Share 2	***	***	***	***	***
Other TSF	Share 2	***	***	***	***	***
All temporary steel fencing	Share 2	100.0	100.0	100.0	100.0	100.0

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

Note: Share 1 is the share of production on the same equipment or using the same workers as in-scope TSF and includes out-of-scope production. Share 2 is the share of in-scope production (i.e., limited to TSF) by specific product category (i.e., animal enclosures vs other TSF).

## U.S. producers' U.S. shipments

Table 3.9 presents U.S. producers' U.S. shipments by type.<sup>5</sup> Commercial U.S. shipments accounted for the largest share of U.S. shipments (over 80 percent in quantity and value) and their share by quantity and value increased during the data collection period. All U.S. shipments that were classified as "internal consumption/for use in rental operations" or "transfers to related firms" were reported by U.S. producers that are also rental companies or related to rental companies and send the temporary steel fencing they produce to their rental operations.<sup>6</sup> Commercial U.S. shipments and U.S. shipments for internal consumption/for use in rental operations each decreased between 2022 and 2024 but were higher in interim 2025 than in interim 2024, while transfers to related firms were unchanged during the data collection period.<sup>7</sup> Transfers to related firms had the highest average unit values during the data collection period, followed by commercial U.S. shipments. Unit values of U.S. producers' U.S. shipments fluctuated during the data collection period, declining from 2022 to 2023 before increasing in 2024 to a level higher than that reported in 2022. The unit value was lower in interim 2025 than in interim 2024.

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<sup>5</sup> \*\*\* reported export shipments during the data collection period. \*\*\* reported \*\*\* pounds of exports in \*\*\*.

<sup>6</sup> These U.S. producers include \*\*\*.

<sup>7</sup> \*\*\*, \*\*\* reported transfers to related firms. \*\*\*.

**Table 3.9 Temporary steel fencing: U.S. producers' shipments, by destination and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial U.S. shipments	Quantity	***	***	***	***	***
Internal consumption / use in rental operations	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Quantity	***	***	***	***	***
U.S. shipments	Quantity	72,307	58,359	48,587	26,453	29,145
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption / use in rental operations	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Value	***	***	***	***	***
U.S. shipments	Value	108,251	84,864	75,786	41,623	45,488
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption / use in rental operations	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Unit value	***	***	***	***	***
U.S. shipments	Unit value	1.50	1.45	1.56	1.57	1.56
Commercial U.S. shipments	Share of quantity	***	***	***	***	***
Internal consumption / use in rental operations	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***	***	***
Internal consumption / use in rental operations	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Share of value	***	***	***	***	***
U.S. shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table 3.10 presents U.S. producers' U.S. shipments by panels and stands.<sup>8</sup> Panels accounted for the vast majority of U.S. shipments (approximately 90 percent or more) during the data collection period. U.S. shipments of panels decreased from 2022 to 2024 but were higher in interim 2025 than in interim 2024. U.S. shipments of stands increased (irregularly for quantity) from 2022 to 2024,<sup>9</sup> and were higher in interim 2025 than in interim 2024. Average unit values for stands were higher than for panels in every period except 2022.

**Table 3.10 Temporary steel fencing: U.S. producers' U.S. shipments, by product type and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim is January through June

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
Panels	Quantity	***	***	***	***	***
Stands	Quantity	***	***	***	***	***
All product types	Quantity	72,307	58,359	48,587	26,453	29,145
Panels	Value	***	***	***	***	***
Stands	Value	***	***	***	***	***
All product types	Value	108,251	84,864	75,786	41,623	45,488
Panels	Unit value	***	***	***	***	***
Stands	Unit value	***	***	***	***	***
All product types	Unit value	1.50	1.45	1.56	1.57	1.56
Panels	Share of quantity	***	***	***	***	***
Stands	Share of quantity	***	***	***	***	***
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Panels	Share of value	***	***	***	***	***
Stands	Share of value	***	***	***	***	***
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

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

<sup>8</sup> No U.S. shipments of stands were reported for animal enclosure TSF.

<sup>9</sup> The increase in U.S. shipments of stands from 2022 to 2024 was due to \*\*\*.

Table 3.11 presents U.S. producers' U.S. shipments of panels by interior type. Both link and mesh interior panels decreased in quantity and value from 2022 to 2024 but were higher in interim 2025 than in interim 2024. By quantity, link interior accounted for the larger share of total U.S. panel shipments in the full year periods, while mesh interior accounted for the larger share during the interim periods. By value, mesh interior accounted for the larger share of total U.S. panel shipments in all time periods except the year 2023. Average unit values were higher for mesh interior panels than link interior panels in all time periods.

**Table 3.11 Temporary steel fencing panels: U.S. producers' U.S. shipments, by interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim is January through June

Panel interior type	Measure	2022	2023	2024	Interim 2024	Interim 2025
Link interior	Quantity	***	***	***	***	***
Mesh interior	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interior	Value	***	***	***	***	***
Mesh interior	Value	***	***	***	***	***
All interior types	Value	***	***	***	***	***
Link interior	Unit value	***	***	***	***	***
Mesh interior	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interior	Share of quantity	***	***	***	***	***
Mesh interior	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interior	Share of value	***	***	***	***	***
Mesh interior	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

## U.S. producers' inventories

Table 3.12 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. End-of-period inventories increased irregularly from 2022 to 2024 and were higher in interim 2025 than in interim 2024. The inventory to U.S. production ratio, the inventory to U.S. shipments ratio, and the inventory to total shipment ratio all roughly doubled from 2022 to 2024 and were higher in interim 2025 than in interim 2024.

**Table 3.12 Temporary steel fencing: U.S. producers' inventories and their ratio to select items, by period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

## U.S. producers' imports from subject sources

U.S. producers' imports of temporary steel fencing are presented in tables 3.13 to 3.15 and the U.S. producers' reasons given for importing the subject merchandise are presented in table 3.16. \*\*\* ratio of subject imports to its U.S. production ranged from \*\*\*; \*\*\* ratio of imports from China to its U.S. production was \*\*\*,<sup>10</sup> and \*\*\* ratio of subject imports to its U.S. production ranged from \*\*\*.

**Table 3.13 Temporary steel fencing: \*\*\*'s U.S. production, subject imports, and ratio of subject imports to production, by period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from China by *** to U.S. production	Ratio	***	***	***	***	***

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

**Table 3.14 Temporary steel fencing: \*\*\*'s U.S. production, subject imports, and ratio of subject imports to production, by period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from China by *** to U.S. production	Ratio	***	***	***	***	***

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

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

<sup>10</sup> \*\*\*.

**Table 3.15 Temporary steel fencing: \*\*\*'s U.S. production, subject imports, and ratio of subject imports to production, by period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from China by *** to U.S. production	Ratio	***	***	***	***	***

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

**Table 3.16 Temporary steel fencing: U.S. producers' reasons for importing**

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

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

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

U.S. producer \*\*\* purchases of imports from subject sources are presented in table 3.17. The ratio of \*\*\* purchases of subject imports to overall U.S. imports from China was \*\*\* percent or less during the data collection periods.

**Table 3.17 Temporary steel fencing: U.S. producer \*\*\*'s purchases of subject imports from China and select ratios, by period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
***'s U.S. purchases of imports from China	Quantity	***	***	***	***	***
Overall U.S. imports from China	Quantity	38,433	33,726	40,840	20,783	21,479
U.S. importer ***'s U.S. imports from China to overall U.S. imports from China	Ratio	***	***	***	***	***

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

## U.S. employment, wages, and productivity

Table 3.18 shows U.S. producers' employment-related data. The number of production and related workers ("PRWs"), total hours worked, wages paid, and hourly wages each decreased from 2022 to 2024 but were each higher in interim 2025 than in interim 2024. Hours worked per PRW increased from 2022 to 2024 and were higher in interim 2025 than in interim 2024. Productivity decreased from 2022 to 2024 and was lower in interim 2025 than in interim 2024. Unit labor costs ranged from \$0.10 to \$0.11 dollars per pound.

**Table 3.18 Temporary steel fencing: U.S. producers' employment related information, by period**

Interim is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	223	181	151	155	170
Total hours worked (1,000 hours)	332	271	254	134	152
Hours worked per PRW (hours)	1,489	1,497	1,682	865	894
Wages paid (\$1,000)	7,356	5,659	5,323	2,688	3,426
Hourly wages (dollars per hour)	\$22.16	\$20.88	\$20.96	\$20.06	\$22.54
Productivity (pounds per hour)	211.5	210.6	207.6	210.0	197.4
Unit labor costs (dollars per pound)	\$0.10	\$0.10	\$0.10	\$0.10	\$0.11

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



## Part 4: U.S. imports, apparent U.S. consumption, and market shares

### U.S. importers

The Commission issued importer questionnaires to 179 firms believed to be importers of subject temporary steel fencing, as well as to all U.S. producers of temporary steel fencing.<sup>1</sup> Usable questionnaire responses were received from 18 companies, representing an estimated \*\*\* percent of U.S. imports from China and virtually all U.S. imports from nonsubject sources in 2024.<sup>2 3</sup>

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

<sup>2</sup> Temporary steel fencing is imported under HTS statistical reporting number 7308.90.9590, a "basket" category that contains out-of-scope merchandise. In exhibit 27 of the petitioner's postconference brief, the petitioner identified 13 potential U.S. importers that had not yet submitted a questionnaire response. One of the firms, \*\*\*, has since provided a questionnaire response. Staff calculated questionnaire coverage by adding to the denominator the import volumes associated with the remaining 12 firms, according to proprietary, Census-edited records for HTS statistical reporting number 7308.90.9590. Import volumes associated with these firms were added if the firm was identified as the importer of record or the consignee. \*\*\*.

Petitioner estimates of import volumes using bill of lading data were not used by staff to calculate questionnaire coverage, as staff believes these estimates are overstated. Several of the entities identified as consignees in the bill of lading data certified that they were not importers of temporary steel fencing. In addition, some of the firms that do import temporary steel fencing also import out-of-scope merchandise under the same HTS statistical reporting number 7308.90.9590, which would also be included in the bill of lading data. The petitioner estimates that 38,423 short tons, or 76.8 million pounds, of temporary steel fencing were imported into the United States in 2024 (this estimate includes 6,287 short tons, or 12.6 million pounds, imported from Hong Kong and South Korea that the petitioner believes were transshipped from China). Petitions, exhibit I-7. The petitioner estimated 6,544 short tons, or 13.1 million pounds, of temporary steel fencing from nonsubject sources were imported into the United States in 2024.

<sup>3</sup> Thirty-seven firms certified that they have not imported temporary steel fencing into the United States since January 1, 2022. An additional 18 firms certified in the preliminary phase of these investigations that they had not imported temporary steel fencing into the United States since January 1, 2021.

Table 4.1 lists all responding U.S. importers of temporary steel fencing from China and other sources, their locations, and their shares of U.S. imports, in 2024.

**Table 4.1 Temporary steel fencing: U.S. importers, their headquarters, and share of imports within each source, 2024**

Share in percent

Firm	Headquarters	China	Nonsubject sources	All import sources
AmeriPacific	Santa Ana, CA	***	***	***
Direct	Houston, TX	***	***	***
G P Roadway	Honolulu, HI	***	***	***
Fence Brokers	Bryant, AR	***	***	***
Jewett	North Plains, OR	***	***	***
KP Distribution	Pomona, CA	***	***	***
L G Sourcing	Mooresville, NC	***	***	***
Master Halco	Dallas, TX	***	***	***
Origin Point	Summerville, SC	***	***	***
Pacific Import	Pauma Valley, CA	***	***	***
Sonco	Capitol Heights, MD	***	***	***
Stephens Pipe	Russell Springs, KY	***	***	***
Sunbelt	Fort Mill, SC	***	***	***
Temporary Fence	Tenino, WA	***	***	***
Tractor Supply	Brentwood, TN	***	***	***
Viking	Austin, TX	***	***	***
Walmart	Bentonville, AR	***	***	***
ZND	Statesville, NC	***	***	***
All firms	Various	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

## U.S. imports

Tables 4.2 and 4.3 and figure 4.1 present data for U.S. imports of temporary steel fencing from China and all other sources. Imports from China increased in quantity irregularly from 2022 to 2024 and were higher in quantity in interim 2025 than in interim 2024, but decreased in value from 2022 to 2024 and were lower in value in interim 2025 than in interim 2024.<sup>4</sup> Imports from nonsubject sources increased in quantity and value from 2022 to 2024 and were higher in quantity and value in interim 2025 than in interim 2024.

Average unit values (“AUVs”) of imports from China decreased from 2022 to 2024 and were lower in interim 2025 than in interim 2024, while AUVs of imports from nonsubject sources increased irregularly from 2022 to 2024 and were higher in interim 2025 than in interim 2024. Imports from China had lower AUVs than nonsubject imports for all time periods.

Imports from China accounted for the majority (over 80 percent) of total imports throughout the data collection period, but their share of total imports by quantity and value decreased from 2022 to 2024 and was lower in interim 2025 than in interim 2024.

Both the ratio of U.S. imports from China to U.S. production and the ratio of U.S. imports from nonsubject sources to U.S. production increased from 2022 to 2024, but the ratio of U.S. imports from China to U.S. production was lower in interim 2025 than in interim 2024, while the ratio of U.S. imports from nonsubject sources to U.S. production was higher in interim 2025 than in interim 2024.

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<sup>4</sup> Twelve U.S. importers’ imports from China decreased during the 2022 to 2024 period, while five U.S. importers’ imports from China increased during this period.

**Table 4.2 Temporary steel fencing: U.S. imports by source and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; share and ratio in percent; interim is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
China	Quantity	38,433	33,726	40,840	20,783	21,479
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	68,101	47,083	46,721	25,844	24,708
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	1.77	1.40	1.14	1.24	1.15
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
China	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	54.7	59.1	77.5	73.8	71.6
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratios are U.S. imports to production.

**Figure 4.1 Temporary steel fencing: U.S. import quantities and average unit values, by source and period**

\* \* \* \* \*

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

**Table 4.3 Temporary steel fencing: Changes in U.S. imports, by source and period**

Changes ( $\Delta$ ) in percent (%) or percentage point (ppt)

Source	Measure	2022-24	2022-23	2023-24	Interim 2024-25
China	% $\Delta$ Quantity	▲ 6.3	▼ (12.2)	▲ 21.1	▲ 3.3
Nonsubject sources	% $\Delta$ Quantity	▲ ***	▲ ***	▲ ***	▲ ***
All import sources	% $\Delta$ Quantity	▲ ***	▼ ***	▲ ***	▲ ***
China	% $\Delta$ Value	▼ (31.4)	▼ (30.9)	▼ (0.8)	▼ (4.4)
Nonsubject sources	% $\Delta$ Value	▲ ***	▲ ***	▲ ***	▲ ***
All import sources	% $\Delta$ Value	▼ ***	▼ ***	▲ ***	▲ ***
China	% $\Delta$ Unit value	▼ (35.4)	▼ (21.2)	▼ (18.1)	▼ (7.5)
Nonsubject sources	% $\Delta$ Unit value	▲ ***	▼ ***	▲ ***	▲ ***
All import sources	% $\Delta$ Unit value	▼ ***	▼ ***	▼ ***	▼ ***
China	ppt $\Delta$ Quantity	▼ ***	▼ ***	▼ ***	▼ ***
Nonsubject sources	ppt $\Delta$ Quantity	▲ ***	▲ ***	▲ ***	▲ ***
All import sources	ppt $\Delta$ Quantity	—	—	—	—
China	ppt $\Delta$ Value	▼ ***	▼ ***	▼ ***	▼ ***
Nonsubject sources	ppt $\Delta$ Value	▲ ***	▲ ***	▲ ***	▲ ***
All import sources	ppt $\Delta$ Value	—	—	—	—
China	ppt $\Delta$ Ratio	▲ 22.7	▲ 4.4	▲ 18.4	▼ (2.3)
Nonsubject sources	ppt $\Delta$ Ratio	▲ ***	▲ ***	▲ ***	▲ ***
All import sources	ppt $\Delta$ Ratio	▲ ***	▲ ***	▲ ***	▲ ***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

Table 4.4 presents U.S. importers' U.S. shipments from China by panels and stands during the data collection period. Panels accounted for the majority (over 85 percent) of U.S. import shipments from China throughout the data collection period. U.S. shipments of panels from China increased irregularly by quantity from 2022 to 2024 but were lower in interim 2025 than in interim 2024, while U.S. shipments of stands from China decreased irregularly from 2022 to 2024 but were higher in interim 2025 than in interim 2024.<sup>5</sup> U.S. shipment AUVs of panels from China decreased from 2022 to 2024 and were lower in interim 2025 than in interim 2024, while the U.S. shipment AUVs of stands increased irregularly from 2022 to 2024 and were higher in interim 2025 than in interim 2024. Unit values of panels were higher than unit values of stands from 2022 to 2024, although the gap narrowed during this period and by interim 2025 stands had a higher U.S. shipment AUV than panels.<sup>6</sup>

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<sup>5</sup> \*\*\* accounted for \*\*\* of reported imports of stands from China in 2022 (\*\* pounds, or \*\* percent), but its imports of stands declined \*\*. See table 3.16.

<sup>6</sup> Nine U.S. importers' U.S. shipment AUVs of panels from China decreased from 2022 to 2024, while seven increased during this period. The top four importers (\*\*), which accounted for \*\* percent of 2024 imports from China, all reported decreases in U.S. shipment AUVs of panels from China from 2022 to 2024.

**Table 4.4 Temporary steel fencing: U.S. importers' U.S. shipments from China, by product type and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound; interim period is January through June

<b>Product types</b>	<b>Measure</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
Panels	Quantity	31,849	29,715	34,440	20,520	18,802
Stands	Quantity	4,034	2,760	3,855	1,882	2,965
All product types	Quantity	35,883	32,475	38,295	22,402	21,767
Panels	Value	68,354	53,489	51,879	31,725	27,688
Stands	Value	4,866	4,343	5,508	2,703	4,915
All product types	Value	73,220	57,832	57,387	34,428	32,603
Panels	Unit value	2.15	1.80	1.51	1.55	1.47
Stands	Unit value	1.21	1.57	1.43	1.44	1.66
All product types	Unit value	2.04	1.78	1.50	1.54	1.50
Panels	Share of quantity	88.8	91.5	89.9	91.6	86.4
Stands	Share of quantity	11.2	8.5	10.1	8.4	13.6
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Panels	Share of value	93.4	92.5	90.4	92.1	84.9
Stands	Share of value	6.6	7.5	9.6	7.9	15.1
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table 4.5 presents U.S. importers' U.S. shipments from nonsubject sources by panels and stands during the data collection period. Panels accounted for the vast majority (over 95 percent in all periods except 2022) of U.S. import shipments from nonsubject sources during the data collection period. U.S. shipments of panels from nonsubject sources increased from 2022 to 2024 and were higher in interim 2025 than in interim 2024, while U.S. shipments of stands from nonsubject sources decreased from 2022 to 2024 and were lower in interim 2025 than in interim 2024. U.S. shipment AUVs of panels and stands from nonsubject sources each decreased irregularly from 2022 to 2024, but the U.S. shipment AUVs of panels were higher in interim 2025 than in interim 2024, while the U.S. shipment AUVs of stands were lower. U.S. shipment AUVs of stands were higher than U.S. shipment AUVs of panels in full year periods, but AUVs of panels were higher than AUVs of stands in the interim periods.

**Table 4.5 Temporary steel fencing: U.S. importers' U.S. shipments from nonsubject sources, by product type and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound; interim period is January through June

Product types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Panels	Quantity	***	***	***	***	***
Stands	Quantity	***	***	***	***	***
All product types	Quantity	***	***	***	***	***
Panels	Value	***	***	***	***	***
Stands	Value	***	***	***	***	***
All product types	Value	***	***	***	***	***
Panels	Unit value	***	***	***	***	***
Stands	Unit value	***	***	***	***	***
All product types	Unit value	***	***	***	***	***
Panels	Share of quantity	***	***	***	***	***
Stands	Share of quantity	***	***	***	***	***
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Panels	Share of value	***	***	***	***	***
Stands	Share of value	***	***	***	***	***
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table 4.6 presents U.S. importers' U.S. shipments from China by panel interior type. Link interior panels accounted for the largest share of interior panel types by quantity and value, with twelve U.S. importers reporting U.S. shipments of link interior panels, seven reporting U.S. shipments of mesh interior panels, and one reported other interior panels.<sup>7</sup> U.S. shipments of link interior panels and other interior panels from China both increased by quantity from 2022 to 2024, but were lower in interim 2025 than in interim 2024. U.S. shipments of mesh interior panels decreased from 2022 to 2024, but were higher in interim 2025 than in interim 2024.

Mesh interior panels had the highest U.S. shipment AUVs, followed by other interior panels.<sup>8</sup> U.S. shipment AUVs of each interior panel type decreased from 2022 to 2024, but U.S. shipment AUVs of link interior panels and other interior panels were higher in interim 2025 than in interim 2024, while U.S. shipment AUVs of mesh interior panels were lower.

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<sup>7</sup> \*\*\* reported its U.S. shipments of TSF panels as having an interior panel type of "other," explaining that its panel types are "\*\*\*\*." Staff believe these panel interior types could potentially be classified as link or mesh. Since \*\*\* did not break out its U.S. shipments accordingly, the data presented for "other" interiors is comprised solely of data submitted by \*\*\*.

U.S. shipments of "All other TSF" panels reported by \*\*\* have been classified for purposes of this report presentation as having a mesh interior panel type. \*\*\* described its interior panel type as "\*\*\*\*" Email from \*\*\*, January 29, 2026.

<sup>8</sup> The higher average unit value of U.S. shipments of mesh interior panels compared to link and other interior panels was largely driven by the higher unit values reported by \*\*\* of its "All other TSF" panels, which ranged from \*\*\*. However, even if \*\*\* U.S. shipments are excluded, average unit values of U.S. shipments of mesh interior panels are still higher than link interiors in all periods except interim 2025 (excluding \*\*\* U.S. shipments would yield the following average unit values for mesh interior panels: \$\*\*\* per pound in 2022, \$\*\*\* per pound in 2023, \$\*\*\* per pound in 2024, \$\*\*\* per pound in interim 2024, and \$\*\*\* per pound in interim 2025).

**Table 4.6 Temporary steel fencing panels: U.S. importers' U.S. shipments from China, by panel interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound; shares in percent; interim period is January through June

<b>Interior types</b>	<b>Measure</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
Link interiors	Quantity	18,725	17,552	22,450	13,209	11,805
Mesh interiors	Quantity	***	***	***	***	***
Other interiors	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interiors	Value	29,292	24,694	29,402	16,726	16,494
Mesh interiors	Value	***	***	***	***	***
Other interiors	Value	***	***	***	***	***
All interior types	Value	***	***	***	***	***
Link interiors	Unit value	1.56	1.41	1.31	1.27	1.40
Mesh interiors	Unit value	***	***	***	***	***
Other interiors	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interiors	Share of quantity	***	***	***	***	***
Mesh interiors	Share of quantity	***	***	***	***	***
Other interiors	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interiors	Share of value	***	***	***	***	***
Mesh interiors	Share of value	***	***	***	***	***
Other interiors	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Table 4.7 presents U.S. importers' U.S. shipments from nonsubject sources by panel interior type. Mesh interior accounted for the largest share of interior panel types throughout the data collection period, except in the year 2022, when link interior panels accounted for more than 90 percent of all panel interior types. Three U.S. importers reported U.S. shipments of steel wire mesh panels and two reported U.S. shipments of chain link panels.<sup>9</sup> U.S. shipments of link interior panels from nonsubject sources decreased from 2022 to 2024, and were lower in interim 2025 than in interim 2024, while U.S. shipments of mesh interior panels from nonsubject sources increased from 2022 to 2024 and was higher in interim 2025 than in interim 2024.

Mesh interior panels had a higher U.S. shipment AUVs than chain link panels in all periods except 2023.<sup>10</sup> U.S. shipment AUVs of each interior panel type decreased from 2022 to 2024 and were lower in interim 2025 than in interim 2024.

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<sup>9</sup> \*\*\*'s U.S. shipments of animal enclosure fencing panels from nonsubject sources (i.e., having an interior panel of "\*\*\*\*") have been classified for purposes of this report presentation as having a mesh interior panel type.

<sup>10</sup> The higher average unit value of U.S. shipments of mesh interior panels compared to link interior panels was largely driven by the higher unit values reported by \*\*\*. If \*\*\* U.S. shipments are excluded, average unit values of U.S. shipments of mesh interior panels are lower than link interiors. Excluding \*\*\* U.S. shipments would yield the following average unit values for mesh interior panels: \$\*\*\* per pound in 2023, \$\*\*\* per pound in 2024, \$\*\*\* per pound in interim 2024, and \$\*\*\* per pound in interim 2025. \*\*\*.

**Table 4.7 Temporary steel fencing: U.S. importers' U.S. shipments from nonsubject sources, by panel interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit values in dollars per pound; shares in percent; interim period is January through June

Interior types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Link interiors	Quantity	***	***	***	***	***
Mesh interiors	Quantity	***	***	***	***	***
Other interiors	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interiors	Value	***	***	***	***	***
Mesh interiors	Value	***	***	***	***	***
Other interiors	Value	***	***	***	***	***
All product types	Value	***	***	***	***	***
Link interiors	Unit value	***	***	***	***	***
Mesh interiors	Unit value	***	***	***	***	***
Other interiors	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interiors	Share of quantity	***	***	***	***	***
Mesh interiors	Share of quantity	***	***	***	***	***
Other interiors	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interiors	Share of value	***	***	***	***	***
Mesh interiors	Share of value	***	***	***	***	***
Other interiors	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

## Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.<sup>11</sup> Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.<sup>12</sup> Imports from China accounted for \*\*\* percent of total imports of temporary steel fencing by quantity from January 2025 through December 2024.

**Table 4.8 Temporary steel fencing: U.S. imports in the twelve-month period preceding the filing of the petitions, January 2024 through December 2024**

Quantity in 1,000 pounds; share in percent

Source of imports	Quantity	Share of quantity
China	40,840	***
All other sources	***	***
All import sources	***	100.0

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

<sup>11</sup> Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

<sup>12</sup> Section 771 (24) of the Act (19 U.S.C § 1677(24)).

## Critical circumstances

On March 16, 2026, Commerce issued its final CVD determination that “critical circumstances” exist with regard to imports from China of temporary steel fencing from mandatory respondent Shijiazhuang SD and from the non-responsive companies (1) Anping County Xingpeng Hardware Co., Ltd., (2) Shenzhou Yuelei Metal Products Co., Ltd.; (3) Sichuan Gold-Link Industry, (4) Sourcing Solution Co., Ltd.; and (5) Tianjin Mengsheng Metal Products, which have been assigned a rate based on total adverse fact available (“AFA”). However, Commerce finds that critical circumstances did not exist with respect to mandatory respondent Hebei Minmetals Co., Ltd. (“Hebei Minmetals”) and all other producers and exporters that enter subject merchandise under the all-others countervailable subsidy rate.<sup>13</sup>

In this CVD investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to countervailing duties retroactive by 90 days from June 20, 2025, the effective date of Commerce’s preliminary affirmative countervailing duty determination. Tables 4.9 and 4.10, and figure 4.2 present data for analysis in relation to a critical circumstances determination in the CVD investigation.

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<sup>13</sup> 91 FR 12567, March 16, 2026, referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

**Table 4.9 Temporary steel fencing: U.S. imports from China subject to affirmative Commerce critical circumstances determination in the CVD investigation, by month**

Quantity in 1,000 pounds

Month	Relation to petition	Quantity
August 2024	Before	***
September 2024	Before	***
October 2024	Before	***
November 2024	Before	***
December 2024	Before	***
January 2025	Before	***
February 2025	After	***
March 2025	After	***
April 2025	After	***
May 2025	After	***
June 2025	After	***
July 2025	After	***

Table continued.

**Table 4.9 (Continued) Temporary steel fencing: U.S. imports from China subject to affirmative Commerce critical circumstances determination in the CVD investigation, by differing number of months before and after the filing of the petition**

Quantity in 1,000 pounds

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

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. In the CVD investigation, Commerce in its final determination found critical circumstances exist for imports from (1) Shijiazhuang SD Company, (2) Anping County Xingpeng Hardware Co., Ltd., (3) Shenzhou Yuele Metal Products Co., Ltd.; (4) Sichuan Gold-Link Industry, (5) Sourcing Solution Co., Ltd.; and (6) Tianjin Mengsheng Metal Products.

**Figure 4.2 Temporary steel fencing: U.S. imports from China subject to affirmative Commerce critical circumstances determination in the CVD investigation, by month**

\* \* \* \* \*

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

Note: In the CVD investigation, Commerce in its final determination found critical circumstances exist for imports from (1) Shijiazhuang SD Company, (2) Anping County Xingpeng Hardware Co., Ltd., (3) Shenzhou Yuelei Metal Products Co., Ltd.; (4) Sichuan Gold- Link Industry, (5) Sourcing Solution Co., Ltd.; and (6) Tianjin Mengsheng Metal Products.

**Table 4.10 Temporary steel fencing: U.S. importers' U.S. inventories of imports from China for analysis in relation to affirmative Commerce critical circumstances determination in the CVD investigation, by date**

Quantity in 1,000 pounds, index in percent where January 2025 = 100.0 percent

Date	Quantity	Index
December 31, 2024	***	100.0
January 31, 2025	***	***
February 28, 2025	***	***
March 31, 2025	***	***
April 30, 2025	***	***
May 31, 2025	***	***
June 30, 2025	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". In the CVD investigation, Commerce in its final determination found critical circumstances exist for imports from (1) Shijiazhuang SD Company, (2) Anping County Xingpeng Hardware Co., Ltd., (3) Shenzhou Yuelei Metal Products Co., Ltd.; (4) Sichuan Gold- Link Industry, (5) Sourcing Solution Co., Ltd.; and (6) Tianjin Mengsheng Metal Products.

On March 16, 2026, Commerce issued its final AD determination that “critical circumstances” exist with regard to imports from China of temporary steel fencing from the China-wide entity.<sup>14</sup> In this AD investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from August 19, 2025, the effective date of Commerce’s preliminary affirmative LTFV determination. Tables 4.11 and 4.12, and figure 4.3 present data for analysis in relation to a critical circumstances determination in the AD investigation.

**Table 4.11 Temporary steel fencing: U.S. imports from China subject to affirmative Commerce critical circumstances determination in the AD investigation, by month**

Quantity in 1,000 pounds

Month	Relation to petition	Quantity
August 2024	Before	***
September 2024	Before	***
October 2024	Before	***
November 2024	Before	***
December 2024	Before	***
January 2025	Before	***
February 2025	After	***
March 2025	After	***
April 2025	After	***
May 2025	After	***
June 2025	After	***
July 2025	After	***

Table continued.

<sup>14</sup> 91 FR 12577, March 16, 2026, referenced in app. A. The China-wide entity does not include the 40 exporter/producer combinations for which separate rates were found and for which critical circumstance were found not to exist. See table 1.3 for a listing of the 40 exporter/producer combinations.

**Table 4.11 (Continued) Temporary steel fencing: U.S. imports from China subject to affirmative Commerce critical circumstances determination in the AD investigation, by differing number of months before and after the filing of the petition**

Quantity in 1,000 pounds;

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

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

Note: In the AD investigation, Commerce found critical circumstances exist for imports from the China-wide entity (other than the 40 exporter/producer combinations for which critical circumstance were found not to exist).

**Figure 4.3 Temporary steel fencing: U.S. imports from China subject to the affirmative Commerce critical circumstances determination in the AD investigation, by month**

\* \* \* \* \*

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

Note: In the AD investigation, Commerce found critical circumstances exist for imports from the China-wide entity (other than the 40 exporter/producer combinations for which critical circumstance were found not to exist).

**Table 4.12 Temporary steel fencing: U.S. importers' U.S. inventories of imports from China for analysis in relation to the affirmative Commerce critical circumstances determination in the AD investigation, by date**

Quantity in 1,000 pounds; index in percent where December 2024 = 100.0 percent

<b>Date</b>	<b>Quantity</b>	<b>Index</b>
December 31, 2024	***	100.0
January 31, 2025	***	***
February 28, 2025	***	***
March 31, 2025	***	***
April 30, 2025	***	***
May 31, 2025	***	***
June 30, 2025	***	***

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

Note: Index based on end of period inventories on January 31, 2025, equal to 100.0 percent.

Note: In the AD investigation, Commerce found critical circumstances exist for imports from the China-wide entity (other than the 40 exporter/producer combinations for which critical circumstance were found not to exist).

## Apparent U.S. consumption and market shares

### Quantity

Table 4.13 and figure 4.4 present data on apparent U.S. consumption and U.S. market shares by quantity for temporary steel fencing. Apparent consumption by quantity decreased by \*\*\* percent from 2022 to 2024 but was \*\*\* percent higher in interim 2025 than in interim 2024.

U.S. shipments by quantity from China increased irregularly from 2022 to 2024 but were lower in interim 2025 than in interim 2024. U.S. shipments from nonsubject sources increased from 2022 to 2024 and were higher in interim 2025 than in interim 2024. U.S. shipments from domestic producers decreased from 2022 to 2024 but were higher in interim 2025 than in interim 2024.

From 2022 to 2024, U.S. producers' U.S. shipments lost \*\*\* percentage points in market share, while U.S. shipments of imports from China and nonsubject sources each gained market share, by \*\*\* percentage points and \*\*\* percentage points, respectively. U.S. producers' U.S. shipments and U.S. shipments of imports from nonsubject sources each had higher market shares in interim 2025 than in interim 2024, by \*\*\* and \*\*\* percentage points, respectively, while U.S. imports from China had a lower market share in interim 2025 than in interim 2024, by \*\*\* percentage points.

**Table 4.13 Temporary steel fencing: Apparent U.S. consumption and market shares based on quantity, by source and period**

Quantity in 1,000 pounds; shares in percent; interim is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	72,307	58,359	48,587	26,453	29,145
China	Quantity	35,883	32,475	38,295	22,402	21,767
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

**Figure 4.4 Temporary steel fencing: Apparent U.S. consumption based on quantity, by source and period**

\* \* \* \* \*

Source: Compiled from data submitted in response to Commission questionnaires

## Value

Table 4.14 and figure 4.5 present data on apparent U.S. consumption and U.S. market shares by value for temporary steel fencing. Apparent consumption by value decreased by \*\*\* percent from 2022 to 2024 but was \*\*\* percent higher in interim 2025 than in interim 2024.

U.S. shipments from China decreased in value from 2022 to 2024 and were lower in interim 2025 than in interim 2024, while U.S. shipments from nonsubject sources increased in value from 2022 to 2024 and were higher in interim 2025 than in interim 2024. U.S. producers' U.S. shipments decreased in value from 2022 to 2024 but were higher in interim 2025 than in interim 2024.

U.S. producers' U.S. shipments lost \*\*\* percentage points of market share from 2022 to 2024, but their market share was \*\*\* percentage points higher in interim 2025 than in interim 2024. U.S. shipments from China and nonsubject sources each gained market share from 2022 to 2024 (\*\*\* and \*\*\* percentage points, respectively), but the market share of U.S. shipments from China was lower in interim 2025 than in interim 2024 (by \*\*\* percentage points) while the market share of U.S. shipments from nonsubject sources was higher (by \*\*\* percentage points).

**Table 4.14 Temporary steel fencing: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; shares in percent; interim is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	108,251	84,864	75,786	41,623	45,488
China	Value	73,220	57,832	57,387	34,428	32,603
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

**Figure 4.5 Temporary steel fencing: Apparent U.S. consumption based on value, by source and period**

\* \* \* \* \*

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

Table 4.15 presents U.S. producers' and U.S. importers' U.S. shipments in 2024, by product type and source. U.S. shipments of chain link panels accounted for approximately half of all 2024 U.S. shipments, followed by U.S. shipments of steel wire mesh panels, which accounted for approximately two-fifths of 2024 U.S. shipments. U.S. shipments of "other panels" and stands each accounted for less than 10 percent of 2024 U.S. shipments.

U.S. producers' U.S. shipments and U.S. shipments from China each accounted for approximately half of 2024 U.S. shipments of chain link panels (U.S. shipments from nonsubject sources accounted for \*\*\* percent). U.S. producers' U.S. shipments accounted for approximately three-fifths of 2024 U.S. shipments of steel wire mesh panels, while U.S. shipments from China accounted for approximately one-fourth, and U.S. shipments from nonsubject sources accounted for less than one-fifth of 2024 U.S. shipments. U.S. shipments from China accounted for \*\*\* 2024 U.S. shipments of "other panels." U.S. shipments from China accounted for the largest share of 2024 U.S. shipments of stands (\*\*\* percent), followed by U.S. producers' U.S. shipments (\*\*\* percent).

**Table 4.15 Temporary steel fencing: U.S. producers' and U.S. importers' U.S. shipments in 2024, by product type and source**

Quantity in 1,000 pounds; shares in percent

Source	Measure	Chain link panel	Steel wire mesh panels	Other panels	Stands	Total
U.S. producers	Quantity	***	***	***	3,136	48,587
China	Quantity	***	***	***	3,855	38,295
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share down	***	***	***	***	***
China	Share down	***	***	***	***	***
Nonsubject sources	Share down	***	***	***	***	***
All import sources	Share down	***	***	***	***	***
All sources	Share down	100.0	100.0	100.0	100.0	100.0
U.S. producers	Share across	***	***	***	***	100.0
China	Share across	***	***	***	***	100.0
Nonsubject sources	Share across	***	***	***	***	100.0
All import sources	Share across	***	***	***	***	100.0
All sources	Share across	***	***	***	***	100.0
U.S. producers	Share down and across	***	***	***	***	***
China	Share down and across	***	***	***	***	***
Nonsubject sources	Share down and across	***	***	***	***	***
All import sources	Share down and across	***	***	***	***	***
All sources	Share down and across	***	***	***	***	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.



## Part 5: Pricing data

### Factors affecting prices

#### Raw material costs

Temporary steel fencing consists of temporary steel fence panels and stands. The major raw materials used to produce panels include steel pipe and tubing for the outer frame and steel wire for the interior.<sup>1</sup> Stands are also produced from steel tubing. Petitioner ZND sources its steel tubing from a variety of suppliers, including vertically integrated firms that produce their own chain link panels with the steel tubing.<sup>2</sup> Chain link and welded wire mesh fencing panels are produced using the same raw materials.<sup>3</sup>

Figure 5.1 (and tables 5.1 and 5.2) show indexed raw material prices over the period of investigation. Overall, prices for steel pipe and tube decreased by 21.9 percent during January 2022 to September 2025, while prices for steel wire decreased by 5.4 percent during the same period.

U.S. producers reported that raw materials as a share of cost of goods sold (“COGS”) for all temporary steel fencing decreased from 75.3 percent in 2022 to 69.1 percent in 2024, and were lower in interim 2025 than in interim 2024.

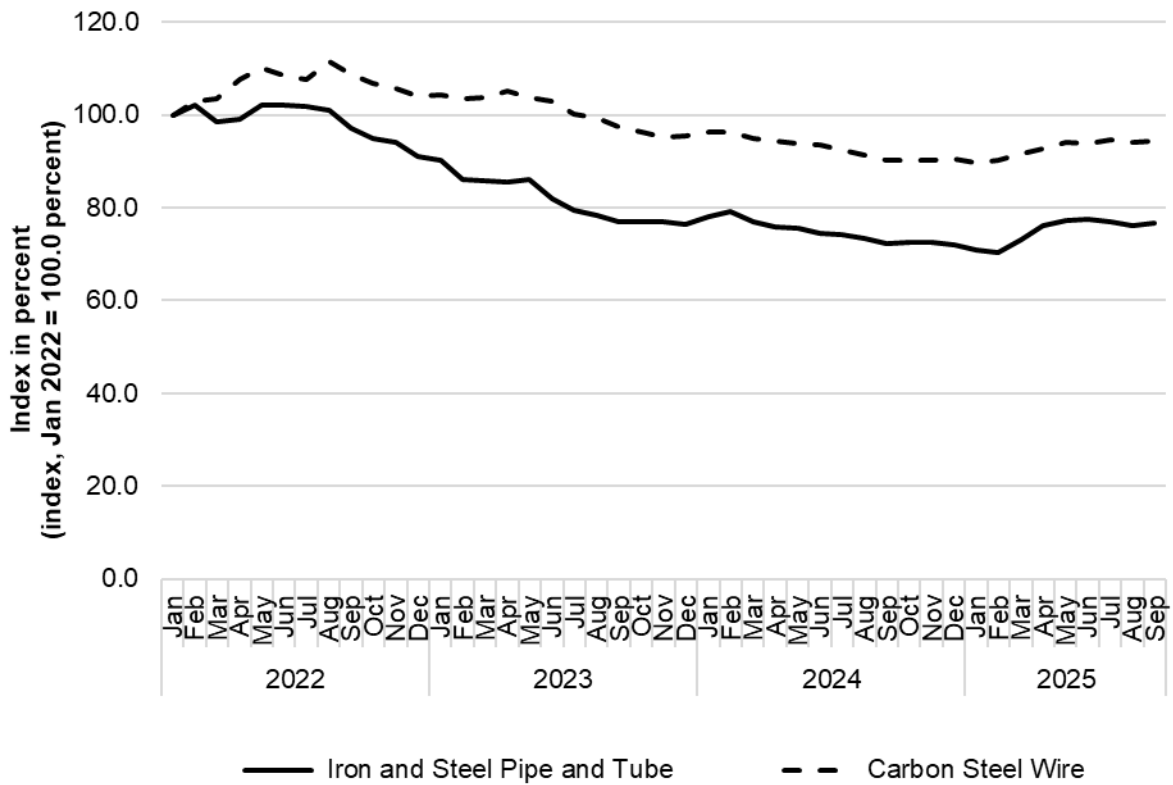
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<sup>1</sup> Conference transcript, p. 23 (Walters).

<sup>2</sup> Conference transcript, p. 23 (Walters).

<sup>3</sup> Conference transcript, p. 38 (Walters).

**Figure 5.1 Raw materials: Iron and steel pipe and tube and carbon steel wire, January 2022 to September 2025**



Source: U.S. Bureau of Labor Statistics, Producer Price Index by Commodity: Metals and Metal Products: Steel Pipe and Tube (WPU101706) and Metals and Metal Products: Steel Wire (WPU101705) retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/WPU101706> and <https://fred.stlouisfed.org/series/WPU101705>, March 30, 2026.

**Table 5.1 Raw materials: Iron and steel pipe and tube index, by month**

Index in percent, not seasonally adjusted, January 2022 = 100

Month	2022	2023	2024	2025
January	100.0	90.3	78.2	71.0
February	102.1	86.0	79.1	70.4
March	98.6	85.9	77.1	73.0
April	98.9	85.5	75.7	76.2
May	102.0	86.0	75.7	77.2
June	102.2	81.8	74.4	77.6
July	101.9	79.5	74.2	77.0
August	100.9	78.4	73.3	76.3
September	97.0	77.0	72.3	76.6
October	95.0	76.9	72.5	76.3
November	94.1	77.1	72.5	76.5
December	91.2	76.5	71.9	78.1

Source: U.S. Bureau of Labor Statistics, Producer Price Index by Commodity: Metals and Metal Products: Steel Pipe and Tube (WPU101706), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/WPU101706>, March 30, 2026.

**Table 5.2 Raw materials: Steel wire drawing: carbon steel wire index, by month**

Index in percent, not seasonally adjusted, January 2022 = 100

Month	2022	2023	2024	2025
January	100.0	104.4	96.2	89.7
February	102.9	103.6	96.3	90.2
March	103.4	103.7	94.9	91.7
April	107.7	105.2	94.3	92.8
May	110.2	103.9	93.8	94.1
June	108.3	102.8	93.5	93.9
July	107.7	100.3	92.4	94.5
August	111.4	99.3	91.2	94.1
September	108.8	97.4	90.2	94.4
October	106.7	96.2	90.1	94.5
November	105.6	95.3	90.2	94.3
December	104.0	95.6	90.5	94.6

Source: U.S. Bureau of Labor Statistics, Producer Price Index by Commodity: Metals and Metal Products: Steel Wire (WPU101705), retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/WPU101705>, March 30, 2026.

## Transportation costs to the U.S. market

Transportation costs for temporary steel fencing shipped from China to the United States averaged 10.7 percent of the landed duty paid value during 2024. This estimate was derived from official import data and represents the transportation and other charges on imports.<sup>4</sup>

## U.S. inland transportation costs

Five of the six responding U.S. producers and 13 of the 16 importers reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from \*\*\* percent to \*\*\* percent while most importers reported costs of \*\*\* percent to \*\*\* percent.

## Pricing practices

### Pricing methods

U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, contracts, and price lists (table 5.3). U.S. importers also reported volume-based price setting, branch-specific pricing by product groups, and price setting as a result of competitor and elasticity research.

**Table 5.3 Temporary steel fencing: Count of U.S. producers' and importers' reported price setting methods**

Count in number of firms reporting

Method	U.S. producers	U.S. importers
Transaction-by-transaction	3	8
Contract	1	4
Set price list	5	4
Other	0	4
Responding firms	5	15

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

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<sup>4</sup> The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2024 and then dividing by the customs value based on HTS statistical reporting number 7308.90.9590.

U.S. producers reported selling only through spot sales, and U.S. importers reported selling the vast majority of their temporary steel fencing in the spot market and annual contracts (table 5.4). For both annual and long-term contracts, the majority of responding U.S. importers reported that the typical contract did not allow for price renegotiations but allowed for fixed prices only. All responding U.S. importers reported that their contracts do not typically index to raw materials.

**Table 5.4 Temporary steel fencing: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2024**

Share in percent

Sale type	U.S. producers	Subject U.S. importers
Long-term contracts	—	4.1
Annual contract	—	22.5
Short-term contracts	—	12.4
Spot sales	100.0	61.0
All sales types	100.0	100.0

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

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

## Sales terms and discounts

U.S. producers typically quote prices on a delivered basis while U.S. importers were evenly split in whether they quote their prices on a delivered or f.o.b. basis. Four of the eight responding U.S. producers reported offering discounts. Among U.S. producers that offered discounts, three reported offering quantity discounts, one reported annual total volume discounts, and three reported offering other discounts, including ad-hoc discounts for large orders and dealer discounts on overall sales (including out-of-scope products). Most responding U.S. importers (9 of 16) reported offering no discount policies. Among the importers that do offer discount policies, six reported offering quantity discounts and one reported customer-specific discounts.

During the preliminary phase of these investigations, respondent Sonco stated that lowering prices or offering price discounts do not automatically yield larger sales volumes for producers because there is a high carrying cost for the customers of holding and managing inventories.<sup>5</sup>

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<sup>5</sup> Respondent Sonco's postconference brief, p. 8.

## Price and purchase cost data

The Commission requested U.S. producers and importers provide quarterly data for the total quantity and f.o.b. value of the following temporary steel fencing products shipped to unrelated U.S. customers during January 2022 to June 2025.

**Product 1.**-- Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.<sup>6</sup>

**Product 2.**-- Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.

**Product 3.**-- Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

**Product 4.**-- Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

**Product 5.**-- Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, sold to fence rental companies.

**Product 6.**-- Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, sold to distributors.

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<sup>6</sup> The Commission's questionnaire defined "fence rental companies" as any company that rents the fencing it owns to end users, whether or not bundled with other services, including but not limited to rental companies, site service providers, and fence contractors.

**Product 7.**-- Temporary steel fencing that is designed to establish a free-standing enclosure for animals, galvanized, not powder coated, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced). Typically sold as kits that contain at least four fence panels. Each kit includes a panel with hinges or a hinged door, is sold as a single unit, and intended to be assembled by the consumer.

Three U.S. producers and six importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products and for all quarters.<sup>7</sup> Pricing data reported by these firms accounted for approximately \*\*\* percent of U.S. producers' U.S. commercial shipments of temporary steel fencing and \*\*\* percent of U.S. commercial shipments of imports from China in 2024.<sup>8</sup> <sup>9</sup> Price data for products 1 to 7 are presented in tables 5.5 to 5.11 and figures 5.2 to 5.8.<sup>10</sup>

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<sup>7</sup> Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

<sup>8</sup> Pricing coverage is based on imports from China reported in questionnaires, which represent \*\*\* of total imports (by value) from China. Price data accounted for \*\*\* percent of U.S. shipments of imports (by value) from China.

<sup>9</sup> Pricing data were not provided by Stephens Pipe and Steel, \*\*\*. The producer reported \*\*\*.

<sup>10</sup> The pricing data presented in this staff report have been revised from the pricing data presented in the prehearing report due to revisions received from \*\*\*.

**Table 5.5 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

Quantity in linear feet; prices in dollars per linear foot; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 1: Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.

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

**Figure 5.2 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by source and quarter**

**Price of product 1**

\* \* \* \* \*

**Volume of product 1**

\* \* \* \* \*

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

Note: Product 1: Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.

**Table 5.6 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

Quantity in linear feet; prices in dollars per linear foot; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Pricing product 2: Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.

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

**Figure 5.3 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

**Price of product 2**

\* \* \* \* \*

**Volume of product 2**

\* \* \* \* \*

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

Note: Pricing product 2: Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.

**Table 5.7 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter**

Quantity in linear feet; prices in dollars per linear foot; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 3: Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

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

**Figure 5.4 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by source and quarter**

**Price of product 3**

\* \* \* \* \*

**Volume of product 3**

\* \* \* \* \*

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

Note: Product 3: Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

**Table 5.8 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter**

Quantity in linear feet; prices in dollars per linear foot; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Product 4: Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

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

**Figure 5.5 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by source and quarter**

**Price of product 4**

\* \* \* \* \*

**Volume of product 4**

\* \* \* \* \*

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

Note: Product 4: Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

**Table 5.9 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 5 and margins of underselling/(overselling), by source and quarter**

Quantity in units; prices in dollars per unit; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Pricing product 5: Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, sold to fence rental companies.

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

**Figure 5.6 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, and margins or differentials of underselling/(overselling), by source and quarter**

**Price of product 5**

\* \* \* \* \*

**Volume of product 5**

\* \* \* \* \*

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

Note: Pricing product 5: Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, sold to fence rental companies.

**Table 5.10 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 6 and margins of underselling/(overselling), by source and quarter**

Quantity in units, price in dollars per unit, margin in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Pricing product 6: Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, sold to distributors.

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

**Figure 5.7 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, by source and quarter**

**Price of product 6**

\* \* \* \* \*

**Volume of product 6**

\* \* \* \* \*

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

Note: Pricing product 6: Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, sold to distributors.

**Table 5.11 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 7 and margins of underselling/(overselling), by source and quarter**

Quantity in linear feet; prices in dollars per linear foot; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Pricing product 7: Temporary steel fencing that is designed to establish a free-standing enclosure for animals, galvanized, not powder coated, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced). Typically sold as kits that contain at least four fence panels. Each kit includes a panel with hinges or a hinged door, is sold as a single unit, and intended to be assembled by the consumer.

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

**Figure 5.8 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported product 7, by source and quarter**

**Price of product 7**

\* \* \* \* \*

**Volume of product 7**

\* \* \* \* \*

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

Note: Pricing product 7: Temporary steel fencing that is designed to establish a free-standing enclosure for animals, galvanized, not powder coated, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced). Typically sold as kits that contain at least four fence panels. Each kit includes a panel with hinges or a hinged door, is sold as a single unit, and intended to be assembled by the consumer.

## Import purchase cost data

Firms that imported the following products from China for their own firm's rental use were requested to provide import purchase cost data (for product equivalents of pricing product 1, pricing product 2, and pricing product 5, which were sold to rental companies but not for their own firm's use). Purchase cost data for products 9 and 10 (equivalent to products 2 and 5, respectively) are presented in tables 5.12 to 5.13 and figures 5.9 to 5.10. There was no purchase cost data reported for product 8 (equivalent to product 1). An alternative pricing product analysis that shows pricing and purchase cost data for combined products 1 and 2 and products 3 and 4 is shown in Appendix K.

**Product 8.**-- Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, imported by your firm for rental use.

**Product 9.**-- Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, imported by your firm for rental use.

**Product 10.**-- Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, imported by your firm for rental use.

One importer \*\*\*, reported usable import purchase cost data for product 9 (equivalent to product 2) and product 10 (equivalent to product 5).<sup>11</sup> Purchase cost data reported by this firm accounted for \*\*\* percent of imports from China in 2024.

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<sup>11</sup> Importer \*\*\* reported useable import purchase cost data for products 9 and 10. The firm was asked to provide additional information regarding the costs and benefits of importing temporary steel fencing itself. They reported that they did not incur additional costs beyond landed duty-paid costs by importing temporary steel fencing itself, rather than purchasing from a U.S. producer or U.S. importer. They reported that the benefit of importing temporary steel fencing itself was that they \*\*\*. They reported that importing temporary steel fencing itself saves the firm \*\*\* percent when compared to purchasing from a U.S. producer and \*\*\* percent when purchasing from an importer, based on previous company transactions.

**Table 5.12 Temporary steel fencing: Weighted-average f.o.b. prices/unit LDP values and quantities of domestic and imported product 9, and price-cost differentials, by quarter**

Quantity in linear feet, price and LDP value in dollars per linear foot, price-cost differential in percent.

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China differential
2022 Q1	***	***	***	***	—
2022 Q2	***	***	***	***	—
2022 Q3	***	***	***	***	—
2022 Q4	***	***	***	***	—
2023 Q1	***	***	***	***	—
2023 Q2	***	***	***	***	—
2023 Q3	***	***	***	***	—
2023 Q4	***	***	***	***	—
2024 Q1	***	***	***	***	—
2024 Q2	***	***	***	***	—
2024 Q3	***	***	***	***	—
2024 Q4	***	***	***	***	—
2025 Q1	***	***	***	***	—
2025 Q2	***	***	***	***	—

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

Note: Pricing product 9: Other temporary steel fence panel, galvanized, not powder coated, *chain link* interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, imported by your firm for rental use.

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

**Figure 5.9 Temporary steel fencing: Weighted average f.o.b. prices/unit LDP values and quantities of domestic and imported product 9, by source and quarter**

**Import purchase cost of product 9**

\* \* \* \* \*

**Volume of product 9**

\* \* \* \* \*

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

Note: Pricing product 9: Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), imported by your firm for rental use.

**Table 5.13 Temporary steel fencing: Weighted-average f.o.b. prices/unit LDP values and quantities of domestic and imported product 10, and price-cost differentials, by quarter**

Quantity in units, price and LDP value in dollars per linear foot, price-cost differential in percent.

Period	U.S. price	U.S. quantity	China unit LDP value	China quantity	China differential
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

Note: Pricing product 10: Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide, imported by your firm for rental use.

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

**Figure 5.10 Temporary steel fencing: Weighted average f.o.b. prices/unit LDP values and quantities of imported product 10, by source and quarter**

**Import purchase cost of product 10**

\* \* \* \* \*

**Volume of product 10**

\* \* \* \* \*

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

Note: Pricing product 10: Other temporary steel fence tube stand, galvanized, not powder coated, with two upright tubes and a base with an actual size of 28 to 37 inches long and 15 to 19 inches wide imported by your firm for rental use.

## **Price and purchase cost trends**

In general, prices and landed duty-paid values varied by product and source. Table 5.14 summarizes price and cost trends by country and by non-rented product. Domestic price decreases ranged from \*\*\* to \*\*\* percent during January 2022 to June 2025 while import price decreases ranged from \*\*\* percent to \*\*\* percent. Domestic price increases were \*\*\* percent while import price increases ranged from \*\*\* percent to \*\*\* percent. Tables 5.15 (figure 5.11) and 5.16 (figure 5.12) show indexed producer and importer prices by product and quarter.

**Table 5.14 Temporary steel fencing: Summary of prices and LDP values, by product and source, January 2022 through June 2025**

Prices/LDP value in dollars per linear foot/unit; quantity in linear feet/units; change in percent

Product	Source	Number of quarters	Quantity	Measure	Low price/unit LDP value	High price/unit LDP value	First quarter price/unit LDP value	Last quarter price/unit LDP value	Change over period
Product 1	United States	14	***	Linear feet	***	***	***	***	***
Product 1	China price	—	***	Linear feet	***	***	***	***	***
Product 1	China cost	—	***	Linear feet	***	***	***	***	***
Product 2	United States	—	***	Linear feet	***	***	***	***	***
Product 2	China price	14	***	Linear feet	***	***	***	***	***
Product 2	China cost	4	***	Linear feet	***	***	***	***	***
Product 3	United States	14	***	Linear feet	***	***	***	***	***
Product 3	China price	—	***	Linear feet	***	***	***	***	***
Product 4	United States	—	***	Linear feet	***	***	***	***	***
Product 4	China price	14	***	Linear feet	***	***	***	***	***
Product 5	United States	9	***	Units	***	***	***	***	***
Product 5	China price	14	***	Units	***	***	***	***	***
Product 5	China cost	4	***	Units	***	***	***	***	***
Product 6	United States	9	***	Units	***	***	***	***	***
Product 6	China price	14	***	Units	***	***	***	***	***
Product 7	United States	14	***	Linear feet	***	***	***	***	***
Product 7	China price	14	***	Linear feet	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Percent change is the change from the first quarter to the last quarter of the data collection period.

**Table 5.15 Temporary steel fencing: Indexed U.S. producer prices, by quarter**

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1	Product 2	Product 3	Product 4	Product 5	Product 6	Product 7
2022 Q1	100.0	—	100.0	—	—	—	100.0
2022 Q2	***	—	***	—	—	—	***
2022 Q3	***	—	***	—	—	—	***
2022 Q4	***	—	***	—	—	—	***
2023 Q1	***	—	***	—	—	—	***
2023 Q2	***	—	***	—	100.0	100.0	***
2023 Q3	***	—	***	—	***	***	***
2023 Q4	***	—	***	—	***	***	***
2024 Q1	***	—	***	—	***	***	***
2024 Q2	***	—	***	—	***	***	***
2024 Q3	***	—	***	—	***	***	***
2024 Q4	***	—	***	—	***	***	***
2025 Q1	***	—	***	—	***	***	***
2025 Q2	***	—	***	—	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Product 5 and 6 are indexed to Q2 2023.

**Figure 5.11 Temporary steel fencing: Indexed U.S. producer prices, by quarter**

\* \* \* \* \*

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

Note: Products 5 and 6 are indexed to Q2 2023.

**Table 5.16 Temporary steel fencing: Indexed subject U.S. importer prices, by quarter**

Index in percent, 2022 Q1= 100.0 percent

Period	Product 1	Product 2	Product 3	Product 4	Product 5	Product 6	Product 7
2022 Q1	—	100.0	—	100.0	100.0	100.0	100.0
2022 Q2	—	***	—	***	***	***	***
2022 Q3	—	***	—	***	***	***	***
2022 Q4	—	***	—	***	***	***	***
2023 Q1	—	***	—	***	***	***	***
2023 Q2	—	***	—	***	***	***	***
2023 Q3	—	***	—	***	***	***	***
2023 Q4	—	***	—	***	***	***	***
2024 Q1	—	***	—	***	***	***	***
2024 Q2	—	***	—	***	***	***	***
2024 Q3	—	***	—	***	***	***	***
2024 Q4	—	***	—	***	***	***	***
2025 Q1	—	***	—	***	***	***	***
2025 Q2	—	***	—	***	***	***	***

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

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

**Figure 5.12 Temporary steel fencing: Indexed subject U.S. importer prices, by quarter**

\* \* \* \* \*

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

### **Price and purchase cost comparisons**

As shown in table 5.17, prices for temporary steel fencing imported from China were below those for U.S.-produced temporary steel fencing in 29 of 32 instances (\$\*\*\*). Margins of underselling for other temporary steel fencing ranged from \*\*\* percent to \*\*\* percent. Prices for animal enclosures (pricing product 7) imported from China were below those for U.S.-produced animal enclosures in 14 instances (\$\*\*\*); margins of underselling ranged from \*\*\* percent to \*\*\* percent. Prices for temporary steel fencing imported from China were above those for U.S.-produced temporary steel fencing in the remaining three instances (\$\*\*\*). Landed duty-paid values for temporary steel fencing imported from China were below those for U.S.-produced temporary steel fencing in all 4 instances (\$\*\*\*) and occurred in 2024, with the price differential ranging from \*\*\* to \*\*\* percent. Instances and quantities of underselling and overselling by product and period are presented in table 5.18.

**Table 5.17 Temporary steel fencing: Instances and quantities of underselling/overselling and the range and average margins, by product**

Value in dollars; margins in percent

Products	Type	Number of instances	Quantity	Value	Average margin	Min margin	Max margin
Product 1	Underselling	—	—	—	—	—	—
Product 2	Underselling	—	—	—	—	—	—
Product 3	Underselling	—	—	—	—	—	—
Product 4	Underselling	—	—	—	—	—	—
Product 5	Underselling	8	***	***	***	***	***
Product 6	Underselling	7	***	***	***	***	***
Products 1-6	Underselling	15	NA	***	***	***	***
Product 7	Underselling	14	***	***	***	***	***
All products	Underselling	29	NA	***	***	***	***
Product 1	Overselling	—	—	—	—	—	—
Product 2	Overselling	—	—	—	—	—	—
Product 3	Overselling	—	—	—	—	—	—
Product 4	Overselling	—	—	—	—	—	—
Product 5	Overselling	1	***	***	***	***	***
Product 6	Overselling	2	***	***	***	***	***
Products 1-6	Overselling	3	NA	***	***	***	***
Product 7	Overselling	—	—	—	—	—	—
All products	Overselling	3	NA	***	***	***	***

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

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

Note: Quantities shown as "NA" are due to unit differences in the pricing products.

**Table 5.18 Temporary steel fencing: Instances and quantities of underselling/overselling and the range and average of margins, by period**

Value in dollars; margins in percent

Period	Grouping	Type	Number of instances	Value	Average margin	Min margin	Max margin
2022	Other TSF	Underselling	—	—	—	—	—
2023	Other TSF	Underselling	4	***	***	***	***
2024	Other TSF	Underselling	8	***	***	***	***
January through June 2025	Other TSF	Underselling	3	***	***	***	***
All periods	Other TSF	Underselling	15	***	***	***	***
2022	Other TSF	Overselling	—	—	—	—	—
2023	Other TSF	Overselling	2	***	***	***	***
2024	Other TSF	Overselling	—	—	—	—	—
January through June 2025	Other TSF	Overselling	1	***	***	***	***
All periods	Other TSF	Overselling	3	***	***	***	***
2022	Animal enclosure	Underselling	4	***	***	***	***
2023	Animal enclosure	Underselling	4	***	***	***	***
2024	Animal enclosure	Underselling	4	***	***	***	***
January through June 2025	Animal enclosure	Underselling	2	***	***	***	***
All periods	Animal enclosure	Underselling	14	***	***	***	***
2022	Animal enclosure	Overselling	—	—	—	—	—
2023	Animal enclosure	Overselling	—	—	—	—	—
2024	Animal enclosure	Overselling	—	—	—	—	—
January through June 2025	Animal enclosure	Overselling	—	—	—	—	—
All periods	Animal enclosure	Overselling	—	—	—	—	—
2022	All TSF	Underselling	4	***	***	***	***
2023	All TSF	Underselling	8	***	***	***	***
2024	All TSF	Underselling	12	***	***	***	***
January through June 2025	All TSF	Underselling	5	***	***	***	***
All periods	All TSF	Underselling	29	***	***	***	***
2022	All TSF	Overselling	—	—	—	—	—
2023	All TSF	Overselling	2	***	***	***	***
2024	All TSF	Overselling	—	—	—	—	—
January through June 2025	All TSF	Overselling	1	***	***	***	***
All periods	All TSF	Overselling	3	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires. Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

## Lost sales and lost revenue

In the preliminary phase of the investigations, the Commission requested that U.S. producers of temporary steel fencing report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of temporary steel fencing from China during January 2021 to September 2024. One U.S. producer submitted lost sales and lost revenue allegations. The responding U.S. producer identified 19 firms with which it lost sales or revenue (11 consisting of lost sales allegations and 8 consisting of both types of allegations).

In the final phase of the investigations, of the seven responding U.S. producers, three reported that they had to reduce prices, one reported that it had to roll back announced price increases, and three firms reported that they had lost sales.

Staff contacted 40 purchasers and received responses from ten purchasers. Responding purchasers reported purchasing and importing \$\*\*\* of temporary steel fencing; \*\*\* percent of which was for animal enclosures, and \*\*\* percent for other types of temporary steel fencing during January 2022 to June 2025 (table 5.19).<sup>12</sup>

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<sup>12</sup> Purchaser \*\*\* did not provide data on purchase and import quantities and values.

**Table 5.19 Temporary steel fencing: Purchasers' reported purchases and imports, by firm and source**

Value in 1,000 dollars, share in percent

Firm	Domestic value	Subject value	All other value	Change in domestic share	Change in subject share	Change in all other share
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
***	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Note: All other includes all other sources and unknown sources. Change is the percentage point change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

During 2024, responding purchasers purchased \*\*\* percent of all types of temporary steel fencing from U.S. producers, \*\*\* percent from China, \*\*\* percent from nonsubject countries, and \*\*\* percent from unknown sources. For animal enclosures, \*\*\* percent were purchased from China, \*\*\* percent from nonsubject sources, with \*\*\* purchases reported from U.S. producers. Purchases of other types of temporary steel fencing were \*\*\* percent from U.S. producers, \*\*\* purchases imported from China, \*\*\* percent from nonsubject sources, and \*\*\* percent from unknown sources. Six of ten responding purchasers reported that they purchased imported temporary steel fencing instead of domestically produced temporary steel fencing, and all six purchasers reported that imports from China were priced lower than domestic product.

Of the ten responding purchasers, five reported that U.S. producers had not reduced prices in order to compete with lower-priced imports from China; five reported that they did not know. Table 5.20 shows purchasers' responses regarding decisions to purchase subject imports instead of domestic product.<sup>13</sup>

<sup>13</sup> Purchaser \*\*\* reported not purchasing from subject sources, however its listed suppliers are \*\*\*.

**Table 5.20 Temporary steel fencing: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Value in 1,000 dollars

<b>Firm</b>	<b>Purchased subject imports instead of domestic</b>	<b>Imports priced lower</b>	<b>Choice based on price</b>	<b>Value</b>	<b>Narrative on reasons for purchasing imports</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

**Table 5.20 (Continued) Temporary steel fencing: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

<b>Firm</b>	<b>Purchased subject imports instead of domestic</b>	<b>Imports priced lower</b>	<b>Choice based on price</b>	<b>Value</b>	<b>Narrative on reasons for purchasing imports</b>
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes: 6; No: 4	Yes: 6; No: 0	Yes: 1; No: 5	***	NA

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

## Part 6: Financial experience of U.S. producers

### Background<sup>1</sup>

\*\*\* U.S. producers provided usable financial results on their temporary steel fencing operations: \*\*\*.<sup>2</sup> Revenue consisted of commercial sales, internal consumption, and transfers to related firms, which accounted for \*\*\* percent, \*\*\* percent, and \*\*\* percent of net sales quantity in 2024, respectively. Four firms, \*\*\*, reported commercial sales; \*\*\* reported their rental business as internal consumption and transfers, respectively; and \*\*\* reported both commercial sales and rental business as internal consumption.<sup>3</sup> All firms but \*\*\* reported financial data for a fiscal year ending December 31 and all firms except \*\*\* provided their financial data on the basis of GAAP.<sup>4 5</sup>

Figure 6.1 presents each responding firm's share of the total reported net sales quantity in 2024.

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<sup>1</sup> The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

<sup>2</sup> \*\*\*. Email from \*\*\*, February 2, 2026.

<sup>3</sup> \*\*\*. U.S. producers' questionnaire response of \*\*\*, questions 3.9a and 3.9b.

<sup>4</sup> \*\*\* reported its financial data for a fiscal year ending \*\*\*, respectively. \*\*\* reported its financial results on a \*\*\* basis.

<sup>5</sup> Staff conducted a verification of \*\*\* financial data and all adjustments that resulted from the verification were incorporated into this report.

**Figure 6.1 Temporary steel fencing: U.S. producers' share of net sales quantity in 2024, by firm**

\* \* \* \* \*

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

**Operations on temporary steel fencing**

Table 6.1 presents aggregated data on U.S. producers' operations in relation to temporary steel fencing, while table 6.2 presents corresponding changes in AUVs. Table 6.3 presents selected company-specific financial data. Appendix H presents data on U.S. producers' financial experience in relation to animal enclosure temporary steel fencing. Appendix I presents data on U.S. producers' financial experience in relation to other TSF. Appendix J presents data on apparent U.S. consumption, U.S. market shares, and U.S. producers' operations for the temporary steel fencing merchant market.

**Table 6.1 Temporary steel fencing: U.S. producers' results of operations, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial sales	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Total net sales	Quantity	***	***	***	***	***
Commercial sales	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw material costs	Value	***	***	***	***	***
COGS: Direct labor costs	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Less scrap sales revenue	Value	***	***	***	***	***
COGS: Total including scrap offset	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw material costs	Ratio to NS	***	***	***	***	***
COGS: Direct labor costs	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Less scrap sales revenue	Ratio to NS	***	***	***	***	***
COGS: Total including scrap offset	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

**Table 6.1 (Continued) Temporary steel fencing: U.S. producers' results of operations, by item and period**

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw material costs before scrap offset	Share	***	***	***	***	***
COGS: Direct labor costs before scrap offset	Share	***	***	***	***	***
COGS: Other factory costs before scrap offset	Share	***	***	***	***	***
COGS: Total before scrap offset	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Less scrap sales revenue	Unit value	***	***	***	***	***
COGS: Total including scrap offset	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Shares represent the share of COGS. Shares and ratios shown as "0.00" represent values greater than zero, but less than "0.005" percent.

**Table 6.2 Temporary steel fencing: Changes in AUVs between comparison periods**

Changes in percent; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Commercial sales	▼***	▼***	▲***	▼***
Internal consumption	▲***	▼***	▲***	▼***
Transfers to related firms	▼***	▼***	***	▲***
Total net sales	▲***	▼***	▲***	▼***
COGS: Raw material costs	▼***	▼***	▲***	▼***
COGS: Direct labor costs	▼***	▼***	▼***	▲***
COGS: Other factory costs	▲***	▲***	▲***	▲***
COGS: Less scrap sales revenue	▲***	▲***	▲***	▲***
COGS: Total including scrap offset	▲***	▼***	▲***	▼***

Table continued.

**Table 6.2 (Continued) Temporary steel fencing: Changes in AUVs between comparison periods**

Changes in dollars per pound; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Commercial sales	▼***	▼***	▲***	▼***
Internal consumption	▲***	▼***	▲***	▼***
Transfers to related firms	▼***	▼***	***	▲***
Total net sales	▲***	▼***	▲***	▼***
COGS: Raw material costs	▼***	▼***	▲***	▼***
COGS: Direct labor costs	▼***	▼***	▼***	▲***
COGS: Other factory costs	▲***	▲***	▲***	▲***
COGS: Less scrap sales revenue	▲***	▲***	▲***	▲***
COGS: Total including scrap offset	▲***	▼***	▲***	▼***
Gross profit or (loss)	▼***	▼***	▲***	▼***
SG&A expense	▲***	▲***	▲***	▲***
Operating income or (loss)	▼***	▼***	▼***	▼***
Net income or (loss)	▼***	▼***	▼***	▼***

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

Note: Percentages and unit values shown as “0.00” represent values greater than zero, but less than “0.005.” Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Table 6.3 Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales quantity**

Quantity in 1,000 pounds; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales value**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss)**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss)**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss)**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss) to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss) to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss) to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net sales value**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit raw material costs**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit direct labor costs**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit other factory costs**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit COGS**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit gross profit or (loss)**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit SG&A expenses**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit operating income or (loss)**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table 6.3 (Continued) Temporary steel fencing: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net income or (loss)**

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Unit value shown as “0.00” represent values greater than zero, but less than “0.005” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Data from incomplete responses are suppressed and shown as “NA.”

**Net sales**

As shown in table 6.1, the industry’s net sales quantity decreased each year from 2022 to 2024 and net sales value decreased irregularly from 2022 to 2024. Both net sales quantity and value were higher in interim 2025 than in interim 2024. On a company-by-company basis, as shown in table 6.3, all firms except \*\*\* reported decreased net sales quantity from 2022 to 2024 and all firms except \*\*\* reported higher net sales quantity in interim 2025 than in interim 2024.<sup>6</sup> All firms reported decreased net sales value from 2022 to 2024 and all except \*\*\* reported higher net sales value in interim 2025 than in interim 2024.

<sup>6</sup> \*\*\*. Email from \*\*\*, December 20, 2025. \*\*\*. Email from \*\*\*, January 14, 2026.

Average unit net sales value increased irregularly from 2022 to 2024, and was lower in interim 2025 than in interim 2024. Two firms, \*\*\*, reported an overall increase in unit net sales values from 2022 to 2024.<sup>7</sup> Four firms, \*\*\*, reported higher unit net sales values in interim 2025 than in interim 2024.

### **Cost of goods sold and gross profit or loss**

As shown in table 6.1, raw materials represent the single largest component of total COGS and ranged from \*\*\* percent of COGS in interim 2025 to \*\*\* percent of total COGS in 2022. Per unit raw material costs decreased irregularly from 2022 to 2024, and were lower in interim 2025 than in interim 2024. As shown in table 6.3, two firms, \*\*\*, reported an overall increase in per unit raw material costs from 2022 to 2024, and all but two firms (\*\*\*) reported lower unit raw material costs in interim 2025 than in interim 2024.<sup>8 9</sup> As a ratio to net sales, raw material costs decreased irregularly from 2022 to 2024, then were lower in interim 2025 than in interim 2024.

Raw materials consisted of steel tubing, steel wire, steel mesh, other steel inputs, and other material inputs. The “other material inputs” category included \*\*\*. Table 6.4 presents raw material costs, by type.

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<sup>7</sup> \*\*\* stated that \*\*\*. Email from \*\*\*, January 27, 2026. \*\*\* reported \*\*\*. Email from \*\*\*, December 9, 2025.

<sup>8</sup> \*\*\*. Email from \*\*\*, January 14, 2026.

<sup>9</sup> \*\*\*.

**Table 6.4 Temporary steel fencing: U.S. producers' raw material costs in 2024**

Value in 1,000 dollars; unit values in dollars per pound

Item	Value	Share of Value
Steel tubing	***	***
Steel mesh	***	***
Steel wire	***	***
Other steel inputs	***	***
Other material inputs	***	***
All raw materials	***	100.0

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

The Commission's questionnaire requested firms to describe the impact of AD/CVD investigations on circular welded pipe and/or steel wire rod on the firm's raw material costs or sourcing patterns for temporary steel fencing. \*\*\* was the only firm which affirmed that there was an impact, describing the impact as \*\*\*.<sup>10</sup>

As a share of total COGS, direct labor costs ranged from \*\*\* percent in interim 2024 to \*\*\* percent in 2023, while other factory costs ranged from \*\*\* percent in 2022 to \*\*\* percent in interim 2025 (table 6.1). Average per-unit direct labor costs remained unchanged from 2022 to 2023 then declined from 2023 to 2024 and were the same in interim 2025 and interim 2024. Average per-unit other factory costs increased from 2022 to 2024 and were higher in interim 2025 than in interim 2024. As a ratio to net sales, direct labor costs decreased irregularly from 2022 to 2024, but were higher in interim 2025 than in interim 2024, while other factory costs increased from 2022 to 2024, and were higher in interim 2025 than in interim 2024.

As shown in table 6.1, total COGS decreased irregularly from 2022 to 2024, but was higher in interim 2025 than in interim 2024. As shown in table 6.3, COGS for \*\*\* firms decreased from 2022 to 2024.<sup>11</sup> COGS in interim 2025 was higher than in interim 2024 for all but three firms, \*\*\*. As shown in table 6.1, COGS as a ratio to net sales increased from 2022 to 2024, but was lower in interim 2025 than in interim 2024. Per unit COGS increased irregularly from 2022 to 2024, but was lower in interim 2025 than in interim 2024.<sup>12</sup>

<sup>10</sup> U.S. producers' questionnaire response of \*\*\*, question 3.9d.

<sup>11</sup> \*\*\*. Email \*\*\*, January 20, 2026.

<sup>12</sup> Unit COGS for \*\*\*.

Table 6.1 shows that U.S. producers' aggregate gross profit declined from 2022 to 2024, as net sales value declined more rapidly than COGS, then was higher in interim 2025 compared to interim 2024 as a higher net sales value more than offset higher COGS. As a ratio to net sales, gross profit declined from 2022 to 2024, then was higher in interim 2025 compared to interim 2024.<sup>13</sup> As shown in table 6.3, the gross profit/loss of all firms except \*\*\* declined/worsened from 2022 to 2024 and all but three firms (\*\*\*) reported increased/improved gross profit/loss in interim 2025 compared to interim 2024. \*\*\* reported gross losses throughout the reporting period.<sup>14</sup>

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<sup>13</sup> For merchant market operations as presented in table J.3 in appendix J, \*\*\*.

<sup>14</sup> \*\*\*. Email from \*\*\*, February 3, 2026.

## **SG&A expenses and operating income or loss**

As shown in table 6.1, the U.S. industry's SG&A expenses increased irregularly from 2022 to 2024 and were higher in interim 2025 than in interim 2024.<sup>15</sup> SG&A expenses as a ratio to net sales increased irregularly from 2022 to 2024 and were higher in interim 2025 than in interim 2024. The average per-unit SG&A expenses increased from 2022 to 2024, and were higher in interim 2025 than in interim 2024. As shown in table 6.3, three firms (\*\*\*) reported an increase in SG&A expenses from 2022 to 2024, and all firms but \*\*\* reported higher SG&A expenses in interim 2025 than in interim 2024.<sup>16</sup>

Table 6.1 shows that U.S. producers' aggregate operating loss worsened from 2022 to 2024, and was worse in interim 2025 than in interim 2024. The operating loss margin (operating loss as a ratio to net sales) worsened irregularly from 2022 to 2024, and was worse in interim 2025 than in interim 2024. As shown in table 6.3, the operating income/loss of all firms except \*\*\* declined/worsened from 2022 to 2024, but four firms (\*\*\*) reported higher/improved operating income/loss in interim 2025 than in interim 2024.

## **All other expenses and net income or loss**

Interest expense, other expense, and other income are classified below the operating income level. In table 6.1, these items are aggregated and only the net amount is shown. Aggregate all other expenses irregularly increased from 2022 to 2024, then were higher in interim 2025 than in interim 2024. \*\*\* accounted for the vast majority of all other expenses.<sup>17</sup>

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<sup>15</sup> For merchant market operations as presented in table J.3 in appendix J, \*\*\*.

<sup>16</sup> \*\*\*. Email from \*\*\*, January 20, 2026.

<sup>17</sup> \*\*\*. Email from \*\*\*, January 20, 2026.

As shown in table 6.1, net losses worsened from 2022 to 2024 and were worse in interim 2025 than in interim 2024.<sup>18</sup> The net loss margin (net loss as a ratio to net sales) exhibited the same trend as net loss. As shown in table 6.3, all firms except \*\*\* reported an overall decline in net income or worsening net loss from 2022 to 2024, and three firms, (\*\*\*) reported lower net income or worse net loss in interim 2024 than in interim 2023.<sup>19</sup>

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<sup>18</sup> For merchant market operations as presented in table J.3 in appendix J, \*\*\*.

<sup>19</sup> The Commission's variance analysis is generally more meaningful when product mix remains the same throughout the period. Because of the variation in unit values and mix of panel (chain link and wire mesh), stand and types of steel (coated and uncoated), a variance analysis is not shown in this section of the report.

# Capital expenditures and research and development expenses

Table 6.5 presents capital expenditures, by firm, and table 6.7 presents R&D expenses, by firm. Tables 6.6 and 6.8 present the firms’ narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively. Capital expenditures decreased irregularly from 2022 to 2024 and were lower in interim 2025 than in interim 2024. Only \*\*\* reported R&D expenses in 2024. One producer, \*\*\*, noting that the firm \*\*\*.”<sup>20</sup>

**Table 6.5 Temporary steel fencing: U.S. producers’ capital expenditures, by firm and period**

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
National	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Data from incomplete responses are suppressed and shown as “NA.”

<sup>20</sup> U.S. producers’ questionnaire response of \*\*\*, question 3.13b.

**Table 6.6 Temporary steel fencing: U.S. producers' narrative descriptions of their capital expenditures, by firm**

Firm	Narrative on capital expenditures
***	***
***	***
***	***
***	***
***	***
***	***

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

**Table 6.7 Temporary steel fencing: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
***	***	***	***	***	***
All firms	***	***	***	***	***

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

**Table 6.8 Temporary steel fencing: U.S. producers' narrative descriptions of their R&D expenses, by firm**

Firm	Narrative on R&D expenses
***	***

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

## Assets and return on assets

Table 6.9 presents data on the U.S. producers' total assets while table 6.10 presents their operating ROA.<sup>21</sup> Table 6.11 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total net assets and the ROA both declined from 2022 to 2024.

**Table 6.9 Temporary steel fencing: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

Firm	2022	2023	2024
American Fence	***	***	***
Behlen	***	***	***
National	***	***	***
Priefert	***	***	***
Stephens Pipe	***	***	***
Tarter	***	***	***
Viking	***	***	***
ZND	***	***	***
All firms	***	***	***

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

Note: Data from incomplete responses are suppressed and shown as "NA."

**Table 6.10 Temporary steel fencing: U.S. producers' ROA, by firm and period**

Ratio in percent

Firm	2022	2023	2024
American Fence	***	***	***
Behlen	***	***	***
National	***	***	***
Priefert	***	***	***
Stephens Pipe	***	***	***
Tarter	***	***	***
Viking	***	***	***
ZND	***	***	***
All firms	***	***	***

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

Note: Data from incomplete responses are suppressed and shown as "NA."

<sup>21</sup> The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

**Table 6.11 Temporary steel fencing: U.S. producers' narrative descriptions of their total net assets, by firm**

Firm	Narrative on assets
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

## Capital and investment

The Commission requested U.S. producers of temporary steel fencing to describe any actual or potential negative effects of imports of temporary steel fencing from China on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table 6.12 presents the number of firms reporting an impact in each category and table 6.13 provides the U.S. producers' narrative responses.

**Table 6.12 Temporary steel fencing: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2022, by effect**

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	3
Denial or rejection of investment proposal	Investment	1
Reduction in the size of capital investments	Investment	2
Return on specific investments negatively impacted	Investment	2
Other investment effects	Investment	0
Any negative effects on investment	Investment	3
Rejection of bank loans	Growth	0
Lowering of credit rating	Growth	0
Problem related to the issue of stocks or bonds	Growth	0
Ability to service debt	Growth	0
Other growth and development effects	Growth	2
Any negative effects on growth and development	Growth	2
Anticipated negative effects of imports	Future	4

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

Note: \*\*\* responded "no" to effects of imports on investments; all firms but \*\*\* responded "no" to effects of imports on growth, and development; and \*\*\* responded "no" to anticipated negative effects of imports.

\*\*\*

**Table 6.13 Temporary steel fencing: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2022, by firm and effect**

Item	Firm name and narrative on impact of imports
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Cancellation, postponement, or rejection of expansion projects	***
Denial or rejection of investment proposal	***
Reduction in the size of capital investments	***
Reduction in the size of capital investments	***
Return on specific investments negatively impacted	***
Return on specific investments negatively impacted	***
Other effects on growth and development	***
Other effects on growth and development	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***
Anticipated effects of imports	***

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



## Part 7: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors<sup>1--</sup>

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,
- (V) inventories of the subject merchandise,

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<sup>1</sup> Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,
- (VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),
- (VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and
- (IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).<sup>2</sup>

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts 4 and 5; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part 6. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

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<sup>2</sup> Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

## The industry in China

The Commission issued foreign producers' or exporters' questionnaires to 77 firms believed to produce and/or export temporary steel fencing from China.<sup>3</sup> Usable responses to the Commission's questionnaire were received from three firms: Wuxi Shuanghuan Heavy Industry Co., Ltd ("Wuxi Shuanghuan"), Wuxi Reliable Scaffolding&Formwork Co., Ltd ("Wuxi Reliable"), and Hebei Yelang Imp. & Exp. Trade Co., LTD. ("Hebei Yelang"). During the preliminary phase, one firm, Shijiazhuang SD Company ("SD Company") submitted a questionnaire response, but that company did not provide a response to the Commission's questionnaire in the final phase.<sup>4</sup> SD Company's data submitted in the Commission's preliminary phase questionnaire covering calendar years 2021 through 2023 and interim periods January through September 2023 and January through September 2024 are presented in appendix L.

Table. 7.1 presents the number of producers/exporters in China that responded to the Commission's questionnaire in this final phase, their exports to the United States as a share of reported U.S. imports from China in 2024, and their estimated share of total production of temporary steel fencing in China during 2024.

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<sup>3</sup> These firms were identified through a review of information submitted in the petitions and presented in third-party sources.

<sup>4</sup> SD Company, a mandatory respondent in Commerce's investigations, withdrew its participation in Commerce's proceedings. Issues and Decision Memorandum for the Final Affirmative Determination in the Less-Than-Fair-Value Investigation of Temporary Steel Fencing from the People's Republic of China, p. 2.

**Table 7.1 Temporary steel fencing: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of reported U.S. imports from China, 2024**

Country	Number of responding firms	Approximate share of production (percent)	Exports as a share of reported U.S. imports from subject country (percent)
China	3	***	***

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

Note: “Approximate share of production” reflects the responding firms’ estimates of their production as a share of total Chinese production of temporary steel fencing in 2024. Since not all firms have perfect knowledge of the industry in their home market, different firms might use different denominators in estimating their firm’s share of the total requested. Of the three firms that responded to the questionnaire, \*\*\*.

Note: “Exports as a share of U.S. imports” reflects a comparison of export data reported by firms in response to the Commission’s foreign producer/exporter questionnaire with 2024 U.S. imports, as reported in Commission questionnaires.

Table 7.2 presents information on the temporary steel fencing operations of the responding producers and exporters in China.

**Table 7.2 Temporary steel fencing: Summary data for producers in China in 2024**

Quantity in 1,000 pounds; share in percent

Producer name	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm’s total shipments exported to the United States (percent)
Wuxi Shuanghuan	***	***	***	***	***	***
Wuxi Reliable	***	***	***	***	***	***
Hebei Yelang	***	***	***	***	***	***
All individual producers	***	100.0	***	100.0	***	***

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

There were no important industry events in the Chinese industry during the data collection period identified by interested parties in this proceeding and no relevant information from outside sources was found.

### **Changes in operations**

Producers in China were asked to report any change in the character of their operations or organization relating to the production of temporary steel fencing since January 1, 2022. One producer, \*\*\*, reported that it \*\*\*.<sup>5</sup> One producer, \*\*\* anticipated future \*\*\*.

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<sup>5</sup> Email from \*\*\* of \*\*\*, March 23, 2026.

## Installed and practical overall capacity

Table 7.3 presents data on producers' installed capacity, practical overall capacity, and practical temporary steel fencing capacity and production on the same equipment in China. Installed overall capacity, practical overall capacity, and overall production each increased from 2022 to 2024, but were lower in interim 2025 than in interim 2024.<sup>6</sup> Overall capacity utilization also increased from 2022 to 2024, but was lower in interim 2025 than in interim 2024.

**Table 7.3 Temporary steel fencing: Producers' installed and practical capacity and production on the same equipment as in-scope production in China, by period**

Quantity in 1,000 pounds

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Installed overall	Capacity	***	57,660	59,301	35,327	33,407
Installed overall	Production	***	39,544	41,737	27,684	20,472
Installed overall	Utilization	***	68.6	70.4	78.4	61.3
Practical overall	Capacity	***	49,470	50,966	30,598	28,906
Practical overall	Production	***	39,544	41,737	27,684	20,472
Practical overall	Utilization	***	79.9	81.9	90.5	70.8
Practical temporary steel fencing	Capacity	***	***	***	***	***
Practical temporary steel fencing	Production	***	***	***	***	***
Practical temporary steel fencing	Utilization	***	***	***	***	***

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

## Constraints on capacity

Table 7.4 presents producers' reported capacity constraints in China since January 1, 2022. \*\*\* producers reported capacity constraints related to the existing labor force, and \*\*\* reported other constraints.

**Table 7.4 Temporary steel fencing: Producers' reported constraints to practical overall capacity in China since January 1, 2022, by constraint and firm**

Type of constraint	Subject foreign industry, firm name, and narrative response on constraints to practical overall capacity
Existing labor force	***
Existing labor force	***
Existing labor force	***
Other constraints	***

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

<sup>6</sup> \*\*\*. Email from \*\*\* of \*\*\*, March 23, 2026.

## Operations on temporary steel fencing

Table 7.5 presents information on the temporary steel fencing operations of the responding producers and exporters in China. Practical temporary steel fencing capacity increased from 2022 to 2024, was higher in interim 2025 than in interim 2024, and is projected to increase from 2025 to 2026. Although the projected capacities are lower than reported for 2024, they are higher than reported for both 2022 and 2023. Temporary steel fencing production increased from 2022 to 2024 and was higher in interim 2025 than in interim 2024, but is projected to decrease from 2024 to 2025, and from 2025 to 2026. Capacity utilization increased irregularly from 2022 to 2024, but was lower in interim 2025 than in interim 2024, and is projected to decline from 2024 into 2025 and 2026.

Exports to the United States increased from 2022 to 2024, and were higher in interim 2025 than in interim 2024. However, projected exports to the United States in 2026 are lower than in 2025.<sup>7</sup> Exports to all other countries increased irregularly from 2022 to 2024, but were lower in interim 2025 than in interim 2024. Projected exports to all other countries are lower in 2026 than reported in 2024.

Export shipments accounted for \*\*\* shipments throughout the data collection period, over half of which were to the United States in all periods except interim 2024, when exports to the United States only accounted for \*\*\* percent of total shipments.<sup>8</sup> Other export markets that the producers reported include \*\*\*.

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<sup>7</sup> \*\*\*, as exports to the United States in 2025 are projected to be \*\*\*.

<sup>8</sup> \*\*\*.

**Table 7.5 Temporary steel fencing: Data on industry in China, by period**

Quantity in 1,000 pounds; interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

**Table 7.5 (Continued) Temporary steel fencing: Data on industry in China, by period**

Share and ratio in percent; interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025	Projection 2025	Projection 2026
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

## Alternative products

As shown in table 7.6, responding firms in China produced other products on the same equipment and machinery used to produce temporary steel fencing. Chinese producers reported producing \*\*\*. These other products accounted for the majority of total reported production, although temporary steel fencing accounted for an increasing share (i.e., between \*\*\* percent in 2022 and \*\*\* percent in interim 2025 of total production on shared equipment and machinery).

**Table 7.6 Temporary steel fencing: Producers' overall production on the same equipment as in-scope production in China by period**

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

Product type	Measure	2022	2023	2024	Interim 2024	Interim 2025
Temporary steel fencing	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Temporary steel fencing	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

## Exports

According to GTA, the leading export markets for iron or steel structures, a category that includes temporary steel fencing and out-of-scope merchandise, from China are South Korea, Indonesia, and Japan (table 7.1). During 2024, South Korea was the top export market for temporary steel fencing from China, accounting for 8.4 percent, followed by Indonesia, accounting for 6.9 percent.

**Table 7.1 Iron or steel structures: Exports from China, by period**

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

Destination market	Measure	2022	2023	2024
United States	Quantity	1,271,873	1,214,901	1,409,805
South Korea	Quantity	1,097,282	1,503,422	1,956,379
Indonesia	Quantity	1,340,466	1,523,021	1,625,665
Japan	Quantity	1,366,372	1,396,847	1,458,017
Thailand	Quantity	436,242	772,713	1,274,738
Hong Kong	Quantity	917,306	971,383	1,024,359
Australia	Quantity	1,011,723	955,152	932,939
Philippines	Quantity	531,656	628,017	740,824
Saudi Arabia	Quantity	172,661	217,936	726,820
All other destination markets	Quantity	7,521,756	9,969,238	12,267,927
Non-U.S. destination markets	Quantity	14,395,463	17,937,730	22,007,666
All destination markets	Quantity	15,667,336	19,152,631	23,417,471
United States	Value	1,429,761	1,146,577	1,224,514
South Korea	Value	886,066	1,240,492	1,572,331
Indonesia	Value	1,058,187	1,006,721	978,741
Japan	Value	1,144,584	1,174,469	1,186,229
Thailand	Value	481,110	619,666	763,954
Hong Kong	Value	1,020,370	946,791	830,238
Australia	Value	1,004,143	751,520	661,740
Philippines	Value	599,749	485,146	492,086
Saudi Arabia	Value	191,604	171,776	538,297
All other destination markets	Value	7,896,698	8,601,363	8,960,137
Non-U.S. destination markets	Value	14,282,510	14,997,943	15,983,753
All destination markets	Value	15,712,272	16,144,521	17,208,267

Table continued.

**Table 7.1 (Continued) Iron or steel structures: Exports from China, by period**

Unit value in dollars per pound; share in percent

Destination market	Measure	2022	2023	2024
United States	Unit value	1.12	0.94	0.87
South Korea	Unit value	0.81	0.83	0.80
Indonesia	Unit value	0.79	0.66	0.60
Japan	Unit value	0.84	0.84	0.81
Thailand	Unit value	1.10	0.80	0.60
Hong Kong	Unit value	1.11	0.97	0.81
Australia	Unit value	0.99	0.79	0.71
Philippines	Unit value	1.13	0.77	0.66
Saudi Arabia	Unit value	1.11	0.79	0.74
All other destination markets	Unit value	1.05	0.86	0.73
Non-U.S. destination markets	Unit value	0.99	0.84	0.73
All destination markets	Unit value	1.00	0.84	0.73
United States	Share of quantity	8.1	6.3	6.0
South Korea	Share of quantity	7.0	7.8	8.4
Indonesia	Share of quantity	8.6	8.0	6.9
Japan	Share of quantity	8.7	7.3	6.2
Thailand	Share of quantity	2.8	4.0	5.4
Hong Kong	Share of quantity	5.9	5.1	4.4
Australia	Share of quantity	6.5	5.0	4.0
Philippines	Share of quantity	3.4	3.3	3.2
Saudi Arabia	Share of quantity	1.1	1.1	3.1
All other destination markets	Share of quantity	48.0	52.1	52.4
Non-U.S. destination markets	Share of quantity	91.9	93.7	94.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7308.90 as reported by China Customs in the Global Trade Atlas Suite database, accessed December 3, 2025.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". United States is shown at the top. All remaining top export destinations are shown in descending order of 2024 data.

## U.S. inventories of imported merchandise

Table 7.2 presents data on U.S. importers' reported inventories of temporary steel fencing.<sup>9</sup> Inventories of temporary steel fencing from subject sources increased from 2022 to 2024 and were higher in interim 2025 than in interim 2024, while inventories from nonsubject sources decreased from 2022 to 2024 and were lower in interim 2025 than in interim 2024. The ratios of subject import inventories to subject imports, U.S. shipments of subject imports, and total shipments of subject imports all increased from 2022 to 2024 and were higher in interim 2025 than in interim 2024, while the ratios of nonsubject import inventories to nonsubject imports, U.S. shipments of nonsubject imports, and total shipments of nonsubject imports all decreased from 2022 to 2024 and were lower in interim 2025 than in interim 2024. Regarding subject imports from China, the ratios of inventories to imports and U.S. shipments to imports were 27.6 percent and 29.4 percent, respectively, in 2024.

**Table 7.2 Temporary steel fencing: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in 1,000 pounds; ratio in percent, interim period is January through June

Measure	Source	2022	2023	2024	Interim 2024	Interim 2025
Inventories quantity	China	6,340	8,547	11,270	6,900	11,184
Ratio to imports	China	16.5	25.3	27.6	16.6	26.0
Ratio to U.S. shipments of imports	China	17.7	26.3	29.4	15.4	25.7
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Nonsubject sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All import sources	***	***	***	***	***
Ratio to imports	All import sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***	***	***
Ratio to total shipments of imports	All import sources	***	***	***	***	***

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

<sup>9</sup> One U.S. importer's inventories (\*\*\*) are not presented in the table because the firm does not track past inventories. The firm, which accounted for \*\*\* percent of subject imports from China and \*\*\* percent of imports from nonsubject sources in 2024, noted, "\*\*\*." Email from \*\*\* of \*\*\*, January 29, 2026.

## U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of temporary steel fencing from China after June 30, 2025. Their reported data are presented in table 7.3. As shown, arranged imports from nonsubject sources (over 85 percent of which was reported by \*\*\*) account for the majority of arranged imports from all sources. Arranged imports of temporary steel fencing from China declined from \*\*\* pounds in the third quarter of 2025 to \*\*\* in the second quarter of 2026.

**Table 7.3 Temporary steel fencing: U.S. importers' arranged imports, by source and period**

Quantity in 1,000 pounds

Source	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Total
China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

## Third-country trade actions

Based on available information, temporary steel fencing from China has not been subject to other antidumping or countervailing duty investigations outside the United States.

## Information on nonsubject countries

Table 7.4 presents global export data for HS subheading 7308.90, a category that includes temporary steel fencing and out-of-scope products. In 2024, China was the leading global exporter of iron or steel structures, accounting for 31.8 percent of the total value of global exports, followed by Poland (6.4 percent) and Germany (6.1 percent).

**Table 7.4 Iron or steel structures: Global exports by exporter and period**

Value in 1,000 dollars; share in percent

Exporting country	Measure	2022	2023	2024
United States	Value	885,841	961,605	991,037
China	Value	15,712,272	16,144,521	17,208,267
Poland	Value	3,352,714	3,438,144	3,441,095
Germany	Value	3,355,780	3,494,323	3,284,804
Netherlands	Value	1,446,257	1,738,206	2,868,707
Spain	Value	1,861,132	2,290,181	1,882,522
Belgium	Value	1,750,060	1,532,181	1,806,204
Mexico	Value	1,741,269	1,801,067	1,591,888
South Korea	Value	1,823,308	1,766,542	1,561,939
Turkey	Value	1,420,148	1,480,101	1,540,009
Italy	Value	1,346,434	1,273,600	1,455,327
Canada	Value	1,228,829	1,300,520	1,309,263
All other exporters	Value	15,076,653	15,325,627	15,115,971
All reporting exporters	Value	51,000,697	52,546,618	54,057,032
United States	Share of value	1.7	1.8	1.8
China	Share of value	30.8	30.7	31.8
Poland	Share of value	6.6	6.5	6.4
Germany	Share of value	6.6	6.6	6.1
Netherlands	Share of value	2.8	3.3	5.3
Spain	Share of value	3.6	4.4	3.5
Belgium	Share of value	3.4	2.9	3.3
Mexico	Share of value	3.4	3.4	2.9
South Korea	Share of value	3.6	3.4	2.9
Turkey	Share of value	2.8	2.8	2.8
Italy	Share of value	2.6	2.4	2.7
Canada	Share of value	2.4	2.5	2.4
All other exporters	Share of value	29.6	29.2	28.0
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7308.90 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed December 3, 2024.

Note: United States is shown at the top followed by the country under investigation, all remaining top exporting countries in descending order of 2024 data.

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



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

Citation	Title	Link
90 FR 7702, January 22, 2025	Temporary Steel Fencing From China; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations	<a href="https://www.govinfo.gov/content/pkg/FR-2025-01-22/pdf/2025-01434.pdf">https://www.govinfo.gov/content/pkg/FR-2025-01-22/pdf/2025-01434.pdf</a>
90 FR 9311, February 11, 2025	Temporary Steel Fencing From the People's Republic of China: Initiation of Countervailing Duty Investigation	<a href="https://www.govinfo.gov/content/pkg/FR-2025-02-11/pdf/2025-02443.pdf">https://www.govinfo.gov/content/pkg/FR-2025-02-11/pdf/2025-02443.pdf</a>
90 FR 9315, February 11, 2025	Temporary Steel Fencing From the People's Republic of China: Initiation of Less-Than-Fair-Value Investigation	<a href="https://www.govinfo.gov/content/pkg/FR-2025-02-11/pdf/2025-02442.pdf">https://www.govinfo.gov/content/pkg/FR-2025-02-11/pdf/2025-02442.pdf</a>
90 FR 11436, March 6, 2025	Temporary Steel Fencing from China, Determinations	<a href="https://www.govinfo.gov/content/pkg/FR-2025-03-06/pdf/2025-03625.pdf">https://www.govinfo.gov/content/pkg/FR-2025-03-06/pdf/2025-03625.pdf</a>
90 FR 26268, June 20, 2025	Temporary Steel Fencing From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, in Part, and Alignment of Final Determination With the Final Antidumping Determination	<a href="https://www.govinfo.gov/content/pkg/FR-2025-06-20/pdf/2025-11383.pdf">https://www.govinfo.gov/content/pkg/FR-2025-06-20/pdf/2025-11383.pdf</a>
90 FR 40332, August 19, 2025	Temporary Steel Fencing From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination and Extension of Provisional Measures	<a href="https://www.govinfo.gov/content/pkg/FR-2025-08-19/pdf/2025-15781.pdf">https://www.govinfo.gov/content/pkg/FR-2025-08-19/pdf/2025-15781.pdf</a>
90 FR 42385, September 2, 2025	Temporary Steel Fencing From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination and Extension of Provisional Measures; Correction	<a href="https://www.govinfo.gov/content/pkg/FR-2025-09-02/pdf/2025-16786.pdf">https://www.govinfo.gov/content/pkg/FR-2025-09-02/pdf/2025-16786.pdf</a>

Citation	Title	Link
90 FR 44103, September 11, 2025	Temporary Steel Fencing From China; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations	<a href="https://www.govinfo.gov/content/pkg/FR-2025-09-11/pdf/2025-17570.pdf">https://www.govinfo.gov/content/pkg/FR-2025-09-11/pdf/2025-17570.pdf</a>
90 FR 54368, November 26, 2025	Temporary Steel Fencing From China; Revised Schedule for the Subject Proceeding	<a href="https://www.govinfo.gov/content/pkg/FR-2025-11-26/pdf/2025-21117.pdf">https://www.govinfo.gov/content/pkg/FR-2025-11-26/pdf/2025-21117.pdf</a>
90 FR 57779, December 12, 2025	Temporary Steel Fencing From China; Revised Schedule for the Subject Proceeding	<a href="https://www.govinfo.gov/content/pkg/FR-2025-12-12/pdf/2025-22621.pdf">https://www.govinfo.gov/content/pkg/FR-2025-12-12/pdf/2025-22621.pdf</a>
91 FR 12567, March 16, 2026	Temporary Steel Fencing From the People's Republic of China; Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part	<a href="https://www.govinfo.gov/content/pkg/FR-2026-03-16/pdf/2026-05005.pdf">https://www.govinfo.gov/content/pkg/FR-2026-03-16/pdf/2026-05005.pdf</a>
91 FR 12577, March 16, 2026	Temporary Steel Fencing From the People's Republic of China; Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part	<a href="https://www.govinfo.gov/content/pkg/FR-2026-03-16/pdf/2026-05004.pdf">https://www.govinfo.gov/content/pkg/FR-2026-03-16/pdf/2026-05004.pdf</a>

**APPENDIX B**

**LIST OF HEARING WITNESSES**



## CALENDAR OF PUBLIC HEARING

Those listed below appeared as witnesses at the United States International Trade Commission's hearing:

**Subject:** Temporary Steel Fencing from China  
**Inv. Nos.:** 701-TA-754 and 731-TA-1732 (Final)  
**Date and Time:** March 12, 2026 - 9:30 a.m.

Sessions were held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

### **OPENING REMARKS:**

In Support of Imposition (**Elizabeth J. Drake**, Schagrin Associates)  
In Opposition to Imposition (**Elizabeth Argenti**, Wilmer Hale)

### **In Support of the Imposition of the Antidumping and Countervailing Duty Orders:**

Schagrin Associates  
Washington, DC  
on behalf of

ZND US Inc. ("ZND")

**Marcel van Kesteren**, Chief Executive Officer, ZND Group; Director, ZND

**Seth Walters**, President, ZND

**Alexandra Garvey**, Business Development Manager, ZND

**Elizabeth J. Drake** )  
 ) – Of COUNSEL  
**Maliha Khan** )

**In Opposition to the Imposition of the  
Antidumping and Countervailing Duty Orders:**

Wilmer Cutler Pickering Hale and Dorr LLP  
Washington, DC  
on behalf of

SONCO Worldwide (“SONCO”)

**Steven Greer**, Chief Executive Officer, SONCO Worldwide

**Giuliano Marinho**, President, SONCO Worldwide

**Robyn Cochran**, General Counsel, Stephens Pipe and Steel

**Joe Orthey**, President, Federal Rent A Fence

**Elizabeth Argenti** )  
 ) – OF COUNSEL  
**Jake Laband** )

Reed Smith  
Washington, DC  
on behalf of

Direct Scaffold Supply LLC (“DSS”)

**James Ivy**, Chief Executive Officer, DSS

**Michael Pichette**, Executive Vice President of Operations, DSS

**Erika Yeager** ) – OF COUNSEL

**REBUTTAL/CLOSING REMARKS:**

In Support of Imposition (**Elizabeth J. Drake**, Schagrin Associates)  
In Opposition to Imposition (**Elizabeth Argenti**, Wilmer Hale)

**APPENDIX C**  
**SUMMARY DATA**

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## Coextensive like product: All TSF

**Table C.1**

**Temporary steel fencing: Summary data concerning the U.S. market, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent—exceptions noted; Interim period is January through June

Item	Reported data					Period change comparisons			
	2022	Calendar year 2023	2024	Interim 2024	2025	2022–24	Calendar year 2022–23	2023–24	Interim 2024–25
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. importers' U.S. shipments of imports from:</b>									
<b>China:</b>									
Quantity.....	35,883	32,475	38,295	22,402	21,767	▲6.7	▼(9.5)	▲17.9	▼(2.8)
Value.....	73,220	57,832	57,387	34,428	32,603	▼(21.6)	▼(21.0)	▼(0.8)	▼(5.3)
Unit value.....	\$2.04	\$1.78	\$1.50	\$1.54	\$1.50	▼(26.6)	▼(12.7)	▼(15.9)	▼(2.5)
Ending inventory quantity.....	6,340	8,547	11,270	6,900	11,184	▲77.8	▲34.8	▲31.9	▲62.1
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>All import sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>U.S. producers':</b>									
Practical capacity quantity.....	124,701	144,614	140,606	71,141	71,438	▲12.8	▲16.0	▼(2.8)	▲0.4
Production quantity.....	70,226	57,060	52,718	28,146	30,012	▼(24.9)	▼(18.7)	▼(7.6)	▲6.6
Capacity utilization (fn1).....	56.3	39.5	37.5	39.6	42.0	▼(18.8)	▼(16.9)	▼(2.0)	▲2.4
<b>U.S. shipments:</b>									
Quantity.....	72,307	58,359	48,587	26,453	29,145	▼(32.8)	▼(19.3)	▼(16.7)	▲10.2
Value.....	108,251	84,864	75,786	41,623	45,488	▼(30.0)	▼(21.6)	▼(10.7)	▲9.3
Unit value.....	\$1.50	\$1.45	\$1.56	\$1.57	\$1.56	▲4.2	▼(2.9)	▲7.3	▼(0.8)
<b>Export shipments:</b>									
Quantity.....	***	***	***	***	***	***	▲***	▼***	***
Value.....	***	***	***	***	***	***	▲***	▼***	***
Unit value.....	***	***	***	***	***	***	▲***	▼***	***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
<b>Inventories/total shipments (fn1).....</b>									
Production workers.....	223	181	151	155	170	▼(32.3)	▼(18.8)	▼(16.6)	▲9.7
Hours worked (1,000s).....	332	271	254	134	152	▼(23.5)	▼(18.4)	▼(6.3)	▲13.4
Wages paid (\$1,000).....	7,356	5,659	5,323	2,688	3,426	▼(27.6)	▼(23.1)	▼(5.9)	▲27.5
Hourly wages (dollars per hour).....	\$22.16	\$20.88	\$20.96	\$20.06	\$22.54	▼(5.4)	▼(5.8)	▲0.4	▲12.4
Productivity (pounds per hour).....	211.5	210.6	207.6	210.0	197.4	▼(1.9)	▼(0.5)	▼(1.4)	▼(6.0)
Unit labor costs.....	\$0.10	\$0.10	\$0.10	\$0.10	\$0.11	▼(3.6)	▼(5.3)	▲1.8	▲19.5

Table continued.

**Table C.1 Continued**

**Temporary steel fencing: Summary data concerning the U.S. market, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent—exceptions noted; Interim period is January through June

Item	Reported data					Period change comparisons			
	2022	Calendar year 2023	2024	Interim 2024	Interim 2025	2022-24	Calendar year 2022-23	2023-24	Interim 2024-25
U.S. producers'--Continued.									
Total market producers:									
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Total assets.....	***	***	***	***	***	▼***	▼***	▼***	***
Open market producers (fn3):									
Commercial sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit COGS.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 6, and 7, and in appendix J of this report.

fn1.—Reported data are in percent and period changes are in percentage points.

fn2.—Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

fn3.—Open market producers' results of operations exclude firms' whose business models were primarily geared towards the production of TSF for use in own firm's or related firms' rental operations. See appendix J for more detailed discussion of the methodology.

Note.—Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

## Split like product: Animal enclosure TSF

**Table C.2**

**Animal enclosure TSF: Summary data concerning the U.S. market, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent—exceptions noted; Interim period is January through June

Item	Reported data					Period change comparisons			
	2022	Calendar year 2023	2024	Interim 2024	2025	2022–24	Calendar year 2022–23	2023–24	Interim 2024–25
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Producers' share (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▼***	▼***	▲***	▼***
<b>U.S. importers' U.S. shipments of imports from:</b>									
<b>China:</b>									
Quantity.....	23,969	15,030	15,069	10,306	7,222	▼(37.1)	▼(37.3)	▲0.3	▼(29.9)
Value.....	53,042	31,260	24,943	17,778	10,584	▼(53.0)	▼(41.1)	▼(20.2)	▼(40.5)
Unit value.....	\$2.21	\$2.08	\$1.66	\$1.73	\$1.47	▼(25.2)	▼(6.0)	▼(20.4)	▼(15.0)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
<b>All import sources:</b>									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>U.S. producers':</b>									
Practical capacity quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>U.S. shipments:</b>									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
<b>Export shipments:</b>									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Production workers.....	80	72	63	63	58	▼(21.3)	▼(10.0)	▼(12.5)	▼(7.9)
Hours worked (1,000s).....	92	79	75	38	36	▼(18.5)	▼(14.1)	▼(5.1)	▼(5.3)
Wages paid (\$1,000).....	1,620	1,421	1,291	679	663	▼(20.3)	▼(12.3)	▼(9.1)	▼(2.4)
Hourly wages (dollars per hour).....	\$17.61	\$17.99	\$17.21	\$17.87	\$18.42	▼(2.2)	▲2.2	▼(4.3)	▲3.1
Productivity (pounds per hour).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▲***

Table continued.

**Table C.2 Continued**

**Animal enclosure TSF: Summary data concerning the U.S. market, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent—exceptions noted; Interim period is January through June

Item	Reported data					Period change comparisons			
	2022	Calendar year 2023	2024	Interim 2024	Interim 2025	2022–24	Calendar year 2022–23	2023–24	Interim 2024–25
U.S. producers'--Continued									
Total market producers':									
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
SG&A expenses.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Capital expenditures.....	***	***	***	***	***	▲***	***	▲***	▼***
Research and development expenses.....	***	***	***	***	***	***	***	***	***
Total assets.....	***	***	***	***	***	▼***	▼***	▼***	***
Open market producers': (fn3)									
Commercial sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
SG&A expenses.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in appendices E, H, and J of this report

fn1.—Reported data are in percent and period changes are in percentage points.

fn2.—Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

fn3.—Open market producers' results of operations exclude firms' whose business models were primarily geared towards the production of TSF for use in own firm's or related firms' rental operations. See appendix J for more detailed discussion of the methodology.

Note.—Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

## Split like product: Other TSF

**Table C.3**

**Other TSF: Summary data concerning the U.S. market, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent—exceptions noted; Interim period is January through June

Item	Reported data					Period change comparisons			
	2022	Calendar year 2023	2024	Interim 2024	2025	2022–24	Calendar year 2022–23	2023–24	Interim 2024–25
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>U.S. importers' U.S. shipments of imports from:</b>									
<b>China:</b>									
Quantity.....	11,914	17,445	23,226	12,096	14,545	▲94.9	▲46.4	▲33.1	▲20.2
Value.....	20,178	26,572	32,444	16,650	22,019	▲60.8	▲31.7	▲22.1	▲32.2
Unit value.....	\$1.69	\$1.52	\$1.40	\$1.38	\$1.51	▼(17.5)	▼(10.1)	▼(8.3)	▲10.0
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>All import sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>U.S. producers':</b>									
Practical capacity quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>U.S. shipments:</b>									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
<b>Export shipments:</b>									
Quantity.....	***	***	***	***	***	***	▲***	▼***	***
Value.....	***	***	***	***	***	***	▲***	▼***	***
Unit value.....	***	***	***	***	***	***	▲***	▼***	***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	143	109	88	92	112	▼(38.5)	▼(23.8)	▼(19.3)	▲21.7
Hours worked (1,000s).....	240	192	179	96	116	▼(25.4)	▼(20.0)	▼(6.8)	▲20.8
Wages paid (\$1,000).....	5,736	4,238	4,032	2,009	2,763	▼(29.7)	▼(26.1)	▼(4.9)	▲37.5
Hourly wages (dollars per hour).....	\$23.90	\$22.07	\$22.53	\$20.93	\$23.82	▼(5.8)	▼(7.6)	▲2.0	▲13.8
Productivity (pounds per hour).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit labor costs.....	***	***	***	***	***	▼***	▼***	▲***	▲***

Table continued.

**Table C.3 Continued**

**Other TSF: Summary data concerning the U.S. market, by item and period**

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent—exceptions noted; Interim period is January through June

Item	Reported data					Period change comparisons			
	2022	Calendar year 2023	2024	Interim 2024	Interim 2025	2022–24	Calendar year 2022–23	2023–24	Interim 2024–25
U.S. producers'--Continued									
Total market producers':									
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit COGS.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Total assets.....	***	***	***	***	***	▼***	▼***	▼***	***
Open market producers': (fn3)									
Commercial sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit COGS.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in appendices G, I, and J of this report.

fn1.—Reported data are in percent and period changes are in percentage points.

fn2.—Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

fn3.—Open market producers' results of operations exclude firms' whose business models were primarily geared towards the production of TSF for use in own firm's or related firms' rental operations. See appendix J for more detailed discussion of the methodology.

Note.—Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

**APPENDIX D**

**U.S. INDUSTRY NARRATIVE RESPONSES TO DOMESTIC LIKE PRODUCT**

**COMPARISON FACTORS**



**Table D.1 Temporary steel fencing: U.S. producers' narrative responses to the domestic like product comparison factors comparing animal enclosure TSF to other TSF**

<b>Factor</b>	<b>Producer name and narrative of domestic like product comparison factors comparing animal enclosures to other TSF</b>
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Manufacturing	***
Manufacturing	***
Manufacturing	***

Factor	Producer name and narrative of domestic like product comparison factors comparing animal enclosures to other TSF
Manufacturing	***
Manufacturing	***
Channels	***
Channels	***
Channels	***
Channels	***
Channels	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

**Table D.2 Temporary steel fencing: U.S. importers' narrative responses to the domestic like product comparison factors comparing animal enclosure TSF to other TSF**

Factor	Importer name and narrative of domestic like product comparison factors comparing animal enclosures to other TSF
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Physical characteristics	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Interchangeability	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Manufacturing	***
Channels	***
Channels	***
Channels	***
Channels	***

Factor	Importer name and narrative of domestic like product comparison factors comparing animal enclosures to other TSF
Channels	***
Channels	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Perceptions	***
Price	***
Price	***
Price	***
Price	***
Price	***
Price	***

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

**Table D.3 Temporary steel fencing: U.S. purchasers' narrative responses to the domestic like product comparison factors comparing animal enclosure TSF to other TSF**

Factor	Purchaser name and narrative of domestic like product comparison factors comparing animal enclosures to other TSF
Physical characteristics	***
Interchangeability	***
Manufacturing	***
Channels	***
Perceptions	***
Price	***
Physical characteristics	***
Interchangeability	***
Manufacturing	***
Channels	***
Physical characteristics	***
Interchangeability	***
Manufacturing	***
Channels	***
Perceptions	***
Price	***
Physical characteristics	***
Interchangeability	***
Manufacturing	***
Channels	***

Factor	Purchaser name and narrative of domestic like product comparison factors comparing animal enclosures to other TSF
Perceptions	***
Price	***
Physical characteristics	***
Interchangeability	***
Manufacturing	***
Channels	***
Perceptions	***
Price	***

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

**APPENDIX E**

**SPLIT LIKE PRODUCTS (SLP) 1: ANIMAL ENCLOSURE TSF**



**Table E.1 Animal enclosure TSF: U.S. producers' output: Practical capacity, by firm and period**

Capacity in 1,000 pounds; Interim period is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table E.1 (Continued) Animal enclosure TSF: U.S. producers' output: Production, by firm and period**

Production in 1,000 pounds; Interim period is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table E.1 (Continued) Animal enclosure TSF: U.S. producers' output: Capacity utilization, by firm and period**

Capacity utilization ratios in percent; Interim period is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table E.1 (Continued) Animal enclosure TSF: U.S. producers' output: Share of production, by firm and period**

Share of production in percent; Interim period is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

**Figure E.1 Animal enclosure TSF: U.S. producers' capacity, production, and capacity utilization, by period**

\* \* \* \* \*

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

**Table E.2 Animal enclosure TSF: U.S. producers' U.S. shipments, by type and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial U.S. shipments	Quantity	***	***	***	***	***
Internal consumption / use in rental operations	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
U.S. shipments	Quantity	***	***	***	***	***
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption / use in rental operations	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption / use in rental operations	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***	***	***
Internal consumption / use in rental operations	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
Commercial U.S. shipments	Share of value	***	***	***	***	***
Internal consumption / use in rental operations	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
U.S. shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table E.3 Animal enclosure TSF: U.S. producers' U.S. shipments, by interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; interim period is January through June

Interior types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Link interiors	Quantity	***	***	***	***	***
Mesh interiors	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interiors	Value	***	***	***	***	***
Mesh interiors	Value	***	***	***	***	***
All interior types	Value	***	***	***	***	***
Link interiors	Unit value	***	***	***	***	***
Mesh interiors	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interiors	Share of quantity	***	***	***	***	***
Mesh interiors	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interiors	Share of value	***	***	***	***	***
Mesh interiors	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

**Table E.4 Animal enclosure TSF: U.S. producers' inventories and their ratio to select items, by period**

Quantity in 1,000 pounds; ratios in percent; interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

**Table E.5 Animal enclosure TSF: U.S. producers' employment related information, by item and period**

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	80	72	63	63	58
Total hours worked (1,000 hours)	92	79	75	38	36
Hours worked per PRW (hours)	1,150	1,097	1,190	603	621
Wages paid (\$1,000)	1,620	1,421	1,291	679	663
Hourly wages (dollars per hour)	\$17.61	\$17.99	\$17.21	\$17.87	\$18.42
Productivity (pounds per hour)	***	***	***	***	***
Unit labor costs (dollars per pound)	***	***	***	***	***

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

**Table E.6 Animal enclosure TSF: U.S. importers, their headquarters, and share of total imports within a given source in 2024, by firm and source**

Shares in percent

Firm	Headquarters	China	Nonsubject sources	All import sources
Jewett	North Plains, OR	***	***	***
L G Sourcing	Mooreville, NC	***	***	***
Master Halco	Dallas, TX	***	***	***
Origin Point	Summerville, SC	***	***	***
Temporary Fence	Tenino, WA	***	***	***
Tractor Supply	Brentwood, TN	***	***	***
Walmart	Bentonville, AR	***	***	***
All firms	Various	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table E.7 Animal enclosure TSF: U.S. imports, by source and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; share and ratio in percent; ratio represents the ratio to U.S. production; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
China	Quantity	24,719	14,328	14,789	10,227	6,607
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	47,569	28,646	22,584	16,338	9,388
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	1.92	2.00	1.53	1.60	1.42
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
China	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

**Figure E.2 Animal enclosure TSF: U.S. import quantities and average unit values, by source and period**

\* \* \* \* \*

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

**Table E.8 Animal enclosure TSF: Changes in U.S. imports, by source and period**

Changes ( $\Delta$ ) in percent (%) or percentage point (ppt)

Source	Measure	2022–24	2022–23	2023–24	Interim 2024–25
China	% $\Delta$ Quantity	▼(40.2)	▼(42.0)	▲3.2	▼(35.4)
Nonsubject sources	% $\Delta$ Quantity	▲***	▲***	▲***	▲***
All import sources	% $\Delta$ Quantity	▼***	▼***	▲***	▼***
China	% $\Delta$ Value	▼(52.5)	▼(39.8)	▼(21.2)	▼(42.5)
Nonsubject sources	% $\Delta$ Value	▲***	▲***	▲***	▲***
All import sources	% $\Delta$ Value	▼***	▼***	▼***	▼***
China	% $\Delta$ Unit value	▼(20.6)	▲3.9	▼(23.6)	▼(11.1)
Nonsubject sources	% $\Delta$ Unit value	▼***	▼***	▼***	▼***
All import sources	% $\Delta$ Unit value	▼***	▲***	▼***	▲***
China	ppt $\Delta$ Quantity	▼***	▼***	▼***	▼***
Nonsubject sources	ppt $\Delta$ Quantity	▲***	▲***	▲***	▲***
All import sources	ppt $\Delta$ Quantity	***	***	***	***
China	ppt $\Delta$ Value	▼***	▼***	▼***	▼***
Nonsubject sources	ppt $\Delta$ Value	▲***	▲***	▲***	▲***
All import sources	ppt $\Delta$ Value	***	***	***	***
China	ppt $\Delta$ Ratio	▼***	▼***	▲***	▼***
Nonsubject sources	ppt $\Delta$ Ratio	▲***	▲***	▲***	▲***
All import sources	ppt $\Delta$ Ratio	▼***	▼***	▲***	▼***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Table E.9 Animal enclosure TSF: U.S. importers' U.S. shipments from China, by panel interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim period is January through June

Interior types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Link interiors	Quantity	***	***	***	***	***
Mesh interiors	Quantity	***	***	***	***	***
Other interiors	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interiors	Value	***	***	***	***	***
Mesh interiors	Value	***	***	***	***	***
Other interiors	Value	***	***	***	***	***
All interior types	Value	***	***	***	***	***
Link interiors	Unit value	***	***	***	***	***
Mesh interiors	Unit value	***	***	***	***	***
Other interiors	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interiors	Share of quantity	***	***	***	***	***
Mesh interiors	Share of quantity	***	***	***	***	***
Other interiors	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interiors	Share of value	***	***	***	***	***
Mesh interiors	Share of value	***	***	***	***	***
Other interiors	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table E.10 Animal enclosure TSF: U.S. importers' U.S. shipments from nonsubject sources, by panel interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim period is January through June

Interior types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Link interiors	Quantity	***	***	***	***	***
Mesh interiors	Quantity	***	***	***	***	***
Other interiors	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interiors	Value	***	***	***	***	***
Mesh interiors	Value	***	***	***	***	***
Other interiors	Value	***	***	***	***	***
All product types	Value	***	***	***	***	***
Link interiors	Unit value	***	***	***	***	***
Mesh interiors	Unit value	***	***	***	***	***
Other interiors	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interiors	Share of quantity	***	***	***	***	***
Mesh interiors	Share of quantity	***	***	***	***	***
Other interiors	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interiors	Share of value	***	***	***	***	***
Mesh interiors	Share of value	***	***	***	***	***
Other interiors	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table E.11 Animal enclosure TSF: U.S. imports in the twelve month period preceding the filing of the petition, January 2024 through December 2024**

Quantity in 1,000 pounds; share of quantity in percent

Source of imports	Quantity	Share of quantity
China	14,789	***
All other sources	***	***
All import sources	***	100.0

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

**Table E.12 Animal enclosure TSF: Apparent U.S. consumption and market shares based on quantity data, by source and period**

Quantity in 1,000 pounds; shares and ratios in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	23,969	15,030	15,069	10,306	7,222
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: The ratio represents the ratio to overall apparent consumption of all TSF inclusive of both animal enclosure TSF and other TSF.

**Figure E.3 Animal enclosure TSF: Apparent U.S. consumption based on quantity data, by source and period**

\* \* \* \* \*

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

**Table E.13 Animal enclosure TSF: Apparent U.S. consumption and market shares based on value data, by source and period**

Value in 1,000 dollars; shares and ratios in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
China	Value	53,042	31,260	24,943	17,778	10,584
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: The ratio represents the ratio of overall apparent consumption of all TSF inclusive of both animal enclosure TSF and other TSF.

**Figure E.4 Animal enclosure TSF: Apparent U.S. consumption based on value data, by source and period**

\* \* \* \* \*

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

**Table E.14 Animal enclosure TSF: U.S. producers' and U.S. importers' U.S. shipments in 2024, by product type and source**

Quantity in 1,000 pounds; shares in percent

Source	Measure	Chain link panel	Steel wire mesh panels	Other panels	Stands	Total
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	15,069
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share down	***	***	***	***	***
China	Share down	***	***	***	***	***
Nonsubject sources	Share down	***	***	***	***	***
All import sources	Share down	***	***	***	***	***
All sources	Share down	100.0	100.0	—	—	100.0
U.S. producers	Share across	***	***	***	***	100.0
China	Share across	***	***	***	***	100.0
Nonsubject sources	Share across	***	***	***	***	100.0
All import sources	Share across	***	***	***	***	100.0
All sources	Share across	***	***	***	***	100.0
U.S. producers	Share down and across	***	***	***	***	***
China	Share down and across	***	***	***	***	***
Nonsubject sources	Share down and across	***	***	***	***	***
All import sources	Share down and across	***	***	***	***	***
All sources	Share down and across	***	***	***	***	100.0

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

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

**Table E.15 Animal enclosure TSF: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Measure	Source	2022	2023	2024	Interim 2024	Interim 2025
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Nonsubject sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All import sources	***	***	***	***	***
Ratio to imports	All import sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***	***	***
Ratio to total shipments of imports	All import sources	***	***	***	***	***

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

**Table E.16 Animal enclosure TSF: Arranged imports, by source and by period**

Quantity in 1,000 pounds

Source	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Total
China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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



**APPENDIX F**

**SPLIT LIKE PRODUCTS (SLP) 2: ALL OTHER TSF**



**Table F.1 Other TSF: U.S. producers' output: Practical capacity, by firm and period**

Capacity in 1,000 pounds; Interim period is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table F.1 (Continued) Other TSF: U.S. producers' output: Production, by firm and period**

Production in 1,000 pounds; Interim period is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table F.1 Continued Other TSF: U.S. producers' output: Capacity utilization, by firm and period**

Capacity utilization ratios in percent; Interim period is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table F.1 (Continued) Other TSF: U.S. producers' output: Share of production, by firm and period**

Share of production in percent; Interim period is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

**Figure F.1 Other TSF: U.S. producers' capacity, production, and capacity utilization, by period**

\* \* \* \* \*

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

**Table F.2 Other TSF: U.S. producers' U.S. shipments, by type and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial U.S. shipments	Quantity	***	***	***	***	***
Internal consumption / use in rental operations	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Quantity	***	***	***	***	***
U.S. shipments	Quantity	***	***	***	***	***
Commercial U.S. shipments	Value	***	***	***	***	***
Internal consumption / use in rental operations	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Value	***	***	***	***	***
U.S. shipments	Value	***	***	***	***	***
Commercial U.S. shipments	Unit value	***	***	***	***	***
Internal consumption / use in rental operations	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Unit value	***	***	***	***	***
U.S. shipments	Unit value	***	***	***	***	***
Commercial U.S. shipments	Share of quantity	***	***	***	***	***
Internal consumption / use in rental operations	Share of quantity	***	***	***	***	***
Transfers to related firms	Share of quantity	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Share of quantity	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Commercial U.S. shipments	Share of value	***	***	***	***	***
Internal consumption / use in rental operations	Share of value	***	***	***	***	***
Transfers to related firms	Share of value	***	***	***	***	***
Combined internal consumption / use in rental operations / transfers	Share of value	***	***	***	***	***
U.S. shipments	Share of value	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table F.3 Other TSF: U.S. producers' U.S. shipments, by product type and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; interim period is January through June

Product types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Panels	Quantity	***	***	***	***	***
Stands	Quantity	***	***	***	***	***
All product types	Quantity	***	***	***	***	***
Panels	Value	***	***	***	***	***
Stands	Value	***	***	***	***	***
All product types	Value	***	***	***	***	***
Panels	Unit value	***	***	***	***	***
Stands	Unit value	***	***	***	***	***
All product types	Unit value	***	***	***	***	***
Panels	Share of quantity	***	***	***	***	***
Stands	Share of quantity	***	***	***	***	***
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Panels	Share of value	***	***	***	***	***
Stands	Share of value	***	***	***	***	***
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

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

**Table F.4 Other TSF: U.S. producers' U.S. shipments, by interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; interim period is January through June

Interior types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Link interior	Quantity	***	***	***	***	***
Mesh interior	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interior	Value	***	***	***	***	***
Mesh interior	Value	***	***	***	***	***
All interior types	Value	***	***	***	***	***
Link interior	Unit value	***	***	***	***	***
Mesh interior	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interior	Share of quantity	***	***	***	***	***
Mesh interior	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interior	Share of value	***	***	***	***	***
Mesh interior	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

**Table F.5 Other TSF: U.S. producers' inventories and their ratio to select items, by period**

Quantity in 1,000 pounds; ratios in percent; interim period is January through June

Item	2022	2023	2024	Interim 2024	Interim 2025
End-of-period inventory quantity	***	***	***	***	***
Inventory ratio to U.S. production	***	***	***	***	***
Inventory ratio to U.S. shipments	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***

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

**Table F.6 Other TSF: \*\*\*'s U.S. production, U.S. imports from subject sources, and ratio of subject imports to production, by period**

Quantity in 1,000 pounds; Ratios in percent; Interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from China by *** to U.S. production	Ratio	***	***	***	***	***

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

**Table F.7 Other TSF: \*\*\*'s U.S. production, U.S. imports from subject sources, and ratio of subject imports to production, by period**

Quantity in 1,000 pounds; Ratios in percent; Interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from China by *** to U.S. production	Ratio	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Note: \*\*\* reported in its preliminary phase questionnaire response (it did not submit a final phase questionnaire), that it is the importer of record for imports that Viking purchases from Shijiazhuang SD Company. Proprietary, Census-edited Customs' import records indicate that Viking imported 41,337 pounds of imports from Qingdao Eone Industry in 2024 and did not import from Shijiazhuang SD Company. Therefore, based on proprietary, Census-edited Customs' import records, Viking's ratio of imports from China to U.S. production is 6.0 percent in the year 2024 and zero percent in all other time periods].

**Table F.8 Other TSF: \*\*\*'s U.S. production, U.S. imports from subject sources, and ratio of subject imports to production, by period**

Quantity in 1,000 pounds; Ratios in percent; Interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. production	Quantity	***	***	***	***	***
Imports from China	Quantity	***	***	***	***	***
Imports from China by *** to U.S. production	Ratio	***	***	***	***	***

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

**Table F.9 Other TSF: U.S. producers' employment related information, by item and period**

Item	2022	2023	2024	Interim 2024	Interim 2025
Production and related workers (PRWs) (number)	143	109	88	92	112
Total hours worked (1,000 hours)	240	192	179	96	116
Hours worked per PRW (hours)	1,678	1,761	2,034	1,043	1,036
Wages paid (\$1,000)	5,736	4,238	4,032	2,009	2,763
Hourly wages (dollars per hour)	\$23.90	\$22.07	\$22.53	\$20.93	\$23.82
Productivity (pounds per hour)	***	***	***	***	***
Unit labor costs (dollars per pound)	***	***	***	***	***

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

**Table F.10 Other TSF: U.S. importers, their headquarters, and share of total imports within a given source in 2024, by firm and source**

Shares in percent

<b>Firm</b>	<b>Headquarters</b>	<b>China</b>	<b>Nonsubject sources</b>	<b>All import sources</b>
AmeriPacific	Santa Ana, CA	***	***	***
Direct	Houston, TX	***	***	***
Fence Brokers	Bryant, AR	***	***	***
G P Roadway	Honolulu, HI	***	***	***
Jewett	North Plains, OR	***	***	***
KP Distribution	Pomona, CA	***	***	***
Master Halco	Dallas, TX	***	***	***
Origin Point	Summerville, SC	***	***	***
Pacific Import	Pauma Valley, CA	***	***	***
Sonco	Capitol Heights, MD	***	***	***
Stephens Pipe	Russell Springs, KY	***	***	***
Sunbelt	Fort Mill, SC	***	***	***
Temporary Fence	Tenino, WA	***	***	***
Viking	Austin, TX	***	***	***
ZND	Statesville, NC	***	***	***
All firms	Various	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table F.11 Other TSF: U.S. imports, by source and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; share and ratio in percent; ratio represents the ratio to U.S. production; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
China	Quantity	13,714	19,398	26,051	10,556	14,872
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	20,532	18,437	24,137	9,506	15,320
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	1.50	0.95	0.93	0.90	1.03
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***
China	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

**Figure F.2 Other TSF: U.S. import quantities and average unit values, by source and period**

\* \* \* \* \*

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

**Table F.12 Other TSF: Changes in U.S. imports, by source and period**

Changes ( $\Delta$ ) in percent (%) or percentage point (ppt)

Source	Measure	2022–24	2022–23	2023–24	Interim 2024–25
China	% $\Delta$ Quantity	▲90.0	▲41.4	▲34.3	▲40.9
Nonsubject sources	% $\Delta$ Quantity	▲***	▲***	▲***	▲***
All import sources	% $\Delta$ Quantity	▲***	▲***	▲***	▲***
China	% $\Delta$ Value	▲17.6	▼(10.2)	▲30.9	▲61.2
Nonsubject sources	% $\Delta$ Value	▼***	▲***	▼***	▲***
All import sources	% $\Delta$ Value	▲***	▼***	▲***	▲***
China	% $\Delta$ Unit value	▼(38.1)	▼(36.5)	▼(2.5)	▲14.4
Nonsubject sources	% $\Delta$ Unit value	▼***	▼***	▼***	▲***
All import sources	% $\Delta$ Unit value	▼***	▼***	▼***	▲***
China	ppt $\Delta$ Quantity	▲***	▼***	▲***	▼***
Nonsubject sources	ppt $\Delta$ Quantity	▼***	▲***	▼***	▲***
All import sources	ppt $\Delta$ Quantity	—	—	—	—
China	ppt $\Delta$ Value	▲***	▼***	▲***	▼***
Nonsubject sources	ppt $\Delta$ Value	▼***	▲***	▼***	▲***
All import sources	ppt $\Delta$ Value	—	—	—	—
China	ppt $\Delta$ Ratio	▲***	▲***	▲***	▲***
Nonsubject sources	ppt $\Delta$ Ratio	▲***	▲***	▲***	▲***
All import sources	ppt $\Delta$ Ratio	▲***	▲***	▲***	▲***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Table F.13 Other TSF: U.S. importers' U.S. shipments from China, by product type and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim period is January through June

Product types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Panels	Quantity	***	***	***	***	***
Stands	Quantity	***	***	***	***	***
All product types	Quantity	***	***	***	***	***
Panels	Value	***	***	***	***	***
Stands	Value	***	***	***	***	***
All product types	Value	***	***	***	***	***
Panels	Unit value	***	***	***	***	***
Stands	Unit value	***	***	***	***	***
All product types	Unit value	***	***	***	***	***
Panels	Share of quantity	***	***	***	***	***
Stands	Share of quantity	***	***	***	***	***
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Panels	Share of value	***	***	***	***	***
Stands	Share of value	***	***	***	***	***
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

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

**Table F.14 Other TSF: U.S. importers' U.S. shipments from nonsubject sources, by product type and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim period is January through June

Product types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Panels	Quantity	***	***	***	***	***
Stands	Quantity	***	***	***	***	***
All product types	Quantity	***	***	***	***	***
Panels	Value	***	***	***	***	***
Stands	Value	***	***	***	***	***
All product types	Value	***	***	***	***	***
Panels	Unit value	***	***	***	***	***
Stands	Unit value	***	***	***	***	***
All product types	Unit value	***	***	***	***	***
Panels	Share of quantity	***	***	***	***	***
Stands	Share of quantity	***	***	***	***	***
All product types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Panels	Share of value	***	***	***	***	***
Stands	Share of value	***	***	***	***	***
All product types	Share of value	100.0	100.0	100.0	100.0	100.0

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

**Table F.15 Other TSF: U.S. importers' U.S. shipments from China, by panel interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim period is January through June

Interior types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Link interiors	Quantity	***	***	***	***	***
Mesh interiors	Quantity	***	***	***	***	***
Other interiors	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interiors	Value	***	***	***	***	***
Mesh interiors	Value	***	***	***	***	***
Other interiors	Value	***	***	***	***	***
All interior types	Value	***	***	***	***	***
Link interiors	Unit value	***	***	***	***	***
Mesh interiors	Unit value	***	***	***	***	***
Other interiors	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interiors	Share of quantity	***	***	***	***	***
Mesh interiors	Share of quantity	***	***	***	***	***
Other interiors	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interiors	Share of value	***	***	***	***	***
Mesh interiors	Share of value	***	***	***	***	***
Other interiors	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

**Table F.16 Other TSF: U.S. importers' U.S. shipments from nonsubject sources, by panel interior types and period**

Quantity in 1,000 pounds; value in 1,000 dollars; unit value in dollars per pound; shares in percent; interim period is January through June

Interior types	Measure	2022	2023	2024	Interim 2024	Interim 2025
Link interiors	Quantity	***	***	***	***	***
Mesh interiors	Quantity	***	***	***	***	***
Other interiors	Quantity	***	***	***	***	***
All interior types	Quantity	***	***	***	***	***
Link interiors	Value	***	***	***	***	***
Mesh interiors	Value	***	***	***	***	***
Other interiors	Value	***	***	***	***	***
All product types	Value	***	***	***	***	***
Link interiors	Unit value	***	***	***	***	***
Mesh interiors	Unit value	***	***	***	***	***
Other interiors	Unit value	***	***	***	***	***
All interior types	Unit value	***	***	***	***	***
Link interiors	Share of quantity	***	***	***	***	***
Mesh interiors	Share of quantity	***	***	***	***	***
Other interiors	Share of quantity	***	***	***	***	***
All interior types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Link interiors	Share of value	***	***	***	***	***
Mesh interiors	Share of value	***	***	***	***	***
Other interiors	Share of value	***	***	***	***	***
All interior types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table F.17 Other TSF: U.S. imports in the twelve month period preceding the filing of the petitions, January 2024 through December 2024**

Quantity in 1,000 pounds; share of quantity in percent

<b>Source of imports</b>	<b>Quantity</b>	<b>Share of quantity</b>
China	26,051	***
All other sources	***	***
All import sources	***	100.0

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

**Table F.18 Other TSF: Apparent U.S. consumption and market shares based on quantity data, by source and period**

Quantity in 1,000 pounds; shares and ratios in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	11,914	17,445	23,226	12,096	14,545
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

**Figure F.3 Other TSF: Apparent U.S. consumption based on quantity data, by source and period**

\* \* \* \* \*

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

**Table F.19 Other TSF: Apparent U.S. consumption and market shares based on value data, by source and period**

Value in 1,000 dollars; shares and ratios in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
China	Value	20,178	26,572	32,444	16,650	22,019
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

**Figure F.4 Other TSF: Apparent U.S. consumption based on value data, by source and period**

\* \* \* \* \*

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

**Table F.20 Other TSF: U.S. producers' and U.S. importers' U.S. shipments in 2024, by product type and source**

Quantity in 1,000 pounds; shares in percent

Source	Measure	Chain link panel	Steel wire mesh panels	Other panels	Stands	Total
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	23,226
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share down	***	***	***	***	***
China	Share down	***	***	***	***	***
Nonsubject sources	Share down	***	***	***	***	***
All import sources	Share down	***	***	***	***	***
All sources	Share down	100.0	100.0	100.0	100.0	100.0
U.S. producers	Share across	***	***	***	***	100.0
China	Share across	***	***	***	***	100.0
Nonsubject sources	Share across	***	***	***	***	100.0
All import sources	Share across	***	***	***	***	100.0
All sources	Share across	***	***	***	***	100.0
U.S. producers	Share down and across	***	***	***	***	***
China	Share down and across	***	***	***	***	***
Nonsubject sources	Share down and across	***	***	***	***	***
All import sources	Share down and across	***	***	***	***	***
All sources	Share down and across	***	***	***	***	100.0

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

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

**Table F.21 Other TSF: U.S. importers' inventories and their ratio to select items, by source and period**

Quantity in 1,000 pounds; ratio in percent; interim is January through June

Measure	Source	2022	2023	2024	Interim 2024	Interim 2025
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Nonsubject sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All import sources	***	***	***	***	***
Ratio to imports	All import sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All import sources	***	***	***	***	***
Ratio to total shipments of imports	All import sources	***	***	***	***	***

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

**Table F.22 Other TSF: Arranged imports, by source and by period**

Quantity in 1,000 pounds

Source	Q3 2025	Q4 2025	Q1 2026	Q2 2026	Total
China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

**APPENDIX G**

**CHANNELS OF DISTRIBUTION, GEOGRAPHIC MARKETS, AND SUPPLY FACTORS**

**FOR ANIMAL ENCLOSURE TSF AND OTHER TSF**



**Table G.1 Animal enclosure TSF: Share of U.S. shipments by source, channel of distribution, and period**

Share in percent; Interim is January through June.

China	Channel	2022	2023	2024	Interim 2024	Interim 2025
United States	Distributors	***	***	***	***	***
United States	Rental companies	***	***	***	***	***
United States	Retailers	***	***	***	***	***
United States	End users	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	Rental companies	***	***	***	***	***
China	Retailers	***	***	***	***	***
China	End users	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	Rental companies	***	***	***	***	***
Nonsubject	Retailers	***	***	***	***	***
Nonsubject	End users	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	Rental companies	***	***	***	***	***
All imports	Retailers	***	***	***	***	***
All imports	End users	***	***	***	***	***

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

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

**Table G.2 Animal enclosure TSF: Count of U.S. producers' and U.S. importers' geographic markets**

Count in number of firms reporting

<b>Region</b>	<b>U.S. producers</b>	<b>China</b>
Northeast	3	5
Midwest	3	6
Southeast	3	6
Central Southwest	3	5
Mountains	3	6
Pacific Coast	3	6
Other	2	5
All regions (except Other)	3	5
Reporting firms	3	6

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

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

**Table G.3 Animal enclosure TSF: Supply factors that affect the ability to increase shipments to the U.S. market**

Quantity in 1,000 pounds; ratios and shares in percent

<b>Factor</b>	<b>Measure</b>	<b>United States</b>
Capacity 2022	Quantity	***
Capacity 2024	Quantity	***
Capacity utilization 2022	Ratio	***
Capacity utilization 2024	Ratio	***
Inventories to total shipments 2022	Ratio	***
Inventories to total shipments 2024	Ratio	***
Home market shipments 2024	Share	***
Non-US export market shipments 2024	Share	***

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

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.5” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table G.4 Other TSF: Share of U.S. shipments by source, channel of distribution, and period**

Share in percent; Interim is January through June.

Source	Channel	2022	2023	2024	Interim 2024	Interim 2025
United States	Distributors	***	***	***	***	***
United States	Rental companies	***	***	***	***	***
United States	Retailers	***	***	***	***	***
United States	End users	***	***	***	***	***
China	Distributors	***	***	***	***	***
China	Rental companies	***	***	***	***	***
China	Retailers	***	***	***	***	***
China	End users	***	***	***	***	***
Nonsubject	Distributors	***	***	***	***	***
Nonsubject	Rental companies	***	***	***	***	***
Nonsubject	Retailers	***	***	***	***	***
Nonsubject	End users	***	***	***	***	***
All imports	Distributors	***	***	***	***	***
All imports	Rental companies	***	***	***	***	***
All imports	Retailers	***	***	***	***	***
All imports	End users	***	***	***	***	***

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

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

**Table G.5 Other TSF: Count of U.S. producers' and U.S. importers' geographic markets**

Count in number of firms reporting

<b>Region</b>	<b>U.S. producers</b>	<b>China</b>
Northeast	2	6
Midwest	2	7
Southeast	2	8
Central Southwest	3	7
Mountains	2	8
Pacific Coast	2	9
Other	1	6
All regions (except Other)	2	5
Reporting firms	3	12

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

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

**Table G.6 Other TSF: Supply factors that affect the ability to increase shipments to the U.S. market**

Quantity in 1,000 pounds; ratios and shares in percent

<b>Factor</b>	<b>Measure</b>	<b>United States</b>
Capacity 2022	Quantity	***
Capacity 2024	Quantity	***
Capacity utilization 2022	Ratio	***
Capacity utilization 2024	Ratio	***
Inventories to total shipments 2022	Ratio	***
Inventories to total shipments 2024	Ratio	***
Home market shipments 2024	Share	***
Non-US export market shipments 2024	Share	***

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

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.5” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**APPENDIX H**

**U.S. PRODUCERS' FINANCIAL DATA FOR ANIMAL ENCLOSURE TSF**



**Figure H.1 Animal enclosure TSF: U.S. producers' share of net sales quantity in 2024, by firm**

\* \* \* \* \*

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

**Table H.1 Animal enclosure TSF: U.S. producers' results of operations, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Total net sales	Quantity	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw material costs	Value	***	***	***	***	***
COGS: Direct labor costs	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Less scrap sales revenue	Value	***	***	***	***	***
COGS: Total including scrap offset	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw material costs	Ratio to NS	***	***	***	***	***
COGS: Direct labor costs	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Less scrap sales revenue	Ratio to NS	***	***	***	***	***
COGS: Total including scrap offset	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

**Table H.1 (Continued) Animal enclosure TSF: U.S. producers' results of operations, by item and period**

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw materials before scrap offset	Share	***	***	***	***	***
COGS: Direct labor before scrap offset	Share	***	***	***	***	***
COGS: Other factory before scrap offset	Share	***	***	***	***	***
COGS: Total before scrap offset	Share	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Less scrap sales revenue	Unit value	***	***	***	***	***
COGS: Total including scrap offset	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	4	4	4	4	4

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

**Table H.2 Animal enclosure TSF: Changes in AUVs between comparison periods**

Changes in percent; interim is January through June

Item	2022-24	2022-23	2023-24	Interim 2024-25
Total net sales	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Raw material costs	▼ ***	▲ ***	▼ ***	▲ ***
COGS: Direct labor costs	▲ ***	▲ ***	▼ ***	▼ ***
COGS: Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Less scrap sales revenue	▲ ***	▲ ***	▼ ***	▲ ***
COGS: Total including scrap offset	▲ ***	▲ ***	▼ ***	▲ ***

Table continued.

**Table H.2 (Continued) Animal enclosure TSF: Changes in AUVs between comparison periods**

Changes in dollars per pound; interim is January through June

Item	2022-24	2022-23	2023-24	Interim 2024-25
Total net sales	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Raw material costs	▼ ***	▲ ***	▼ ***	▲ ***
COGS: Direct labor costs	▲ ***	▲ ***	▼ ***	▼ ***
COGS: Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Less scrap sales revenue	▲ ***	▲ ***	▼ ***	▲ ***
COGS: Total including scrap offset	▲ ***	▲ ***	▼ ***	▲ ***
Gross profit or (loss)	▼ ***	▼ ***	▲ ***	▼ ***
SG&A expense	▲ ***	▲ ***	▲ ***	▲ ***
Operating income or (loss)	▼ ***	▼ ***	▲ ***	▼ ***
Net income or (loss)	▼ ***	▼ ***	▲ ***	▼ ***

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

Note: Unit values shown as “0.00” represent values greater than zero, but less than “0.005,” respectively. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Table H.3 Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales quantity**

Quantity in 1,000 pounds; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales value**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss)**

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses**

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss)**

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss)**

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS to net sales ratio**

Ratios in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss) to net sales ratio**

Ratios in percent; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss) to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss) to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net sales value**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit raw material costs**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit direct labor costs**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit other factory costs**

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit COGS**

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit gross profit or (loss)**

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit SG&A expenses**

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit operating income or (loss)**

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table H.3 (Continued) Animal enclosure TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net income or (loss)**

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
Behlen	***	***	***	***	***
Priefert	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: \*\*\*. Unit values shown as "0.00" represent values greater than zero, but less than "0.005" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Data from incomplete responses are suppressed and shown as "NA."

**Table H.4 Animal enclosure TSF: U.S. producers' raw material costs in 2024**

Value in 1,000 dollars; unit values in dollars per pound; share of value in percent

Item	Value	Share of value
Steel tubing	***	***
Steel mesh	***	***
Steel wire	***	***
Other steel inputs	***	***
Other material inputs	***	***
All raw materials	***	100.0

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

**Table H.5 Animal enclosure TSF: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
***	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table H.6 Animal enclosure TSF: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

Firm	2022	2023	2024
American Fence	***	***	***
Behlen	***	***	***
Priefert	***	***	***
Stephens Pipe	***	***	***
Tarter	***	***	***
All firms	***	***	***

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

Note: \*\*\*. U.S. producers' questionnaire response of \*\*\*, question 3.12b. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Data from incomplete responses are suppressed and shown as “NA.”

**Table H.7 Animal enclosure TSF: U.S. producers' ROA, by firm and period**

Ratio in percent

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
American Fence	***	***	***
Behlen	***	***	***
Priefert	***	***	***
Stephens Pipe	***	***	***
Tarter	***	***	***
All firms	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Data from incomplete responses are suppressed and shown as “NA.”



## **APPENDIX I**

### **U.S. PRODUCERS' FINANCIAL DATA FOR OTHER TSF**



**Figure I.1 Other TSF: U.S. producers' share of net sales quantity in 2024, by firm**

\* \* \* \* \*

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

**Table I.1 Other TSF: U.S. producers' results of operations, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratios in percent; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial sales	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Total net sales	Quantity	***	***	***	***	***
Commercial sales	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Total net sales	Value	***	***	***	***	***
COGS: Raw material costs	Value	***	***	***	***	***
COGS: Direct labor costs	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Less scrap sales revenue	Value	***	***	***	***	***
COGS: Total including scrap offset	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw material costs	Ratio to NS	***	***	***	***	***
COGS: Direct labor costs	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Less scrap sales revenue	Ratio to NS	***	***	***	***	***
COGS: Total including scrap offset	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

**Table I.1 (Continued) Other TSF: U.S. producers' results of operations, by item and period**

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw material costs before scrap offset	Share	***	***	***	***	***
COGS: Direct labor costs before scrap offset	Share	***	***	***	***	***
COGS: Other factory costs before scrap offset	Share	***	***	***	***	***
COGS: Total before scrap offset	Share	***	***	***	***	***
Commercial sales	Unit value	***	***	***	***	***
Internal consumption	Unit value	***	***	***	***	***
Transfers to related firms	Unit value	***	***	***	***	***
Total net sales	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Less scrap sales revenue	Unit value	***	***	***	***	***
COGS: Total including scrap offset	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	5	5	5	5	5

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

**Table I.2 Other TSF: Changes in AUVs between comparison periods**

Changes in percent; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Commercial sales	▲ ***	▼ ***	▲ ***	▼ ***
Internal consumption	▲ ***	▼ ***	▲ ***	▼ ***
Transfers to related firms	▼ ***	▼ ***	***	▲ ***
Total net sales	▲ ***	▼ ***	▲ ***	▼ ***
COGS: Raw material costs	▼ ***	▼ ***	▲ ***	▼ ***
COGS: Direct labor costs	▼ ***	▼ ***	▼ ***	▲ ***
COGS: Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Less scrap sales revenue	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total including scrap offset	▲ ***	▼ ***	▲ ***	▼ ***

Table continued.

**Table I.2 (Continued) Other TSF: Changes in AUVs between comparison periods**

Changes in dollars per pound; interim is January through June

Item	2022–24	2022–23	2023–24	Interim 2024–25
Commercial sales	▲ ***	▼ ***	▲ ***	▼ ***
Internal consumption	▲ ***	▼ ***	▲ ***	▼ ***
Transfers to related firms	▼ ***	▼ ***	***	▲ ***
Total net sales	▲ ***	▼ ***	▲ ***	▼ ***
COGS: Raw material costs	▼ ***	▼ ***	▲ ***	▼ ***
COGS: Direct labor costs	▼ ***	▼ ***	▼ ***	▲ ***
COGS: Other factory costs	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Less scrap sales revenue	▲ ***	▲ ***	▲ ***	▲ ***
COGS: Total including scrap offset	▲ ***	▼ ***	▲ ***	▼ ***
Gross profit or (loss)	▼ ***	▼ ***	▲ ***	▲ ***
SG&A expense	▲ ***	▲ ***	▲ ***	▲ ***
Operating income or (loss)	▼ ***	▼ ***	▼ ***	▼ ***
Net income or (loss)	▼ ***	▼ ***	▼ ***	▼ ***

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

Note: Unit values shown as “0.00” represent values greater than zero, but less than “0.005,” respectively. Zeroes, null values, and undefined calculations are suppressed and shown as “—”. Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Table I.3 Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales quantity**

Quantity in 1,000 pounds; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net sales value**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss)**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss)**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss)**

Value in 1,000 dollars; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**COGS to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Gross profit or (loss) to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**SG&A expenses to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Operating income or (loss) to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Net income or (loss) to net sales ratio**

Ratios in percent; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net sales value**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit raw material costs**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit direct labor costs**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit other factory costs**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit COGS**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit gross profit or (loss)**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit SG&A expenses**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit operating income or (loss)**

Unit values in dollars per pound; interim is January through June

<b>Firm</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Interim 2024</b>	<b>Interim 2025</b>
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

**Table I.3 (Continued) Other TSF: U.S. producers' sales, costs/expenses, and profitability, by firm and period**

**Unit net income or (loss)**

Unit values in dollars per pound; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
American Fence	***	***	***	***	***
National	***	***	***	***	***
Stephens Pipe	***	***	***	***	***
Tarter	***	***	***	***	***
Viking	***	***	***	***	***
ZND	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Data from incomplete responses are suppressed and shown as "NA."

**Table I.4 Other TSF: U.S. producers' raw material costs in 2024**

Value in 1,000 dollars; unit values in dollars per pound; share of value in percent

Item	Value	Share of value
Steel tubing	***	***
Steel mesh	***	***
Steel wire	***	***
Other steel inputs	***	***
Other material inputs	***	***
All raw materials	***	100.0

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

**Table I.5 Other TSF: U.S. producers' capital expenditures, by firm and period**

Value in 1,000 dollars; interim is January through June

Firm	2022	2023	2024	Interim 2024	Interim 2025
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All firms	***	***	***	***	***

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

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

**Table I.6 Other TSF: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars

Firm	2022	2023	2024	Interim 2024	Interim 2025
***	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table I.7 Other TSF: U.S. producers' total net assets, by firm and period**

Value in 1,000 dollars

Firm	2022	2023	2024
American Fence	***	***	***
National	***	***	***
Stephens Pipe	***	***	***
Tarter	***	***	***
Viking	***	***	***
ZND	***	***	***
All firms	***	***	***

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

Note: Data from incomplete responses are suppressed and shown as “NA.”

**Table I.8 Other TSF: U.S. producers' ROA, by firm and period**

Ratio in percent

Firm	2022	2023	2024
American Fence	***	***	***
National	***	***	***
Stephens Pipe	***	***	***
Tarter	***	***	***
Viking	***	***	***
ZND	***	***	***
All firms	***	***	***

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

Note: Data from incomplete responses are suppressed and shown as “NA.”



**APPENDIX J**

**APPARENT TSF U.S. MERCHANT MARKET CONSUMPTION AND U.S. PRODUCERS'**

**TSF MERCHANT MARKET FINANCIAL DATA**



Four U.S. producers provided financial results specific to their operations in the merchant temporary steel fencing market (\*\*\*).<sup>1</sup> Data on the merchant market for these four U.S. producers are presented in tables J.1 through J.12 and figures J.1 through J.12, while financial information on the total market is presented in Part 6 of this report and apparent U.S. consumption on the total market is presented in Part 4 of this report.

**Table J.1 Temporary steel fencing: Apparent U.S. merchant market consumption based on quantity data, by source and period**

Quantity in 1,000 pounds; shares in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	35,883	32,475	38,295	22,402	21,767
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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<sup>1</sup> \*\*\*. U.S. producers' questionnaire response of \*\*\*, questions 3.9a and 3.9b.

**Figure J.1 Temporary steel fencing: Apparent U.S. merchant market consumption based on quantity data, by source and period**

\* \* \* \* \*

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

**Table J.2 Temporary steel fencing: Apparent U.S. merchant market consumption and market shares based on value data, by source and period**

Value in 1,000 dollars; shares in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
China	Value	73,220	57,832	57,387	34,428	32,603
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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

**Figure J.2 Temporary steel fencing: Apparent U.S. merchant market consumption based on value data, by source and period**

\* \* \* \* \*

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

**Figure J.3 Temporary steel fencing: U.S. producers' share of net commercial sales quantity in 2024, by firm**

\* \* \* \* \*

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

**Table J.3 Temporary steel fencing: U.S. producers' results of operations for the merchant market, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial sales	Quantity	***	***	***	***	***
Commercial sales	Value	***	***	***	***	***
COGS: Raw material costs	Value	***	***	***	***	***
COGS: Direct labor costs	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Less scrap sales revenue	Value	***	***	***	***	***
COGS: Total including scrap offset	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw material costs	Ratio to NS	***	***	***	***	***
COGS: Direct labor costs	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Less scrap sales revenue	Ratio to NS	***	***	***	***	***
COGS: Total including scrap offset	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

**Table J.3 (Continued) Temporary steel fencing: U.S. producers' results of operations for the merchant market, by item and period**

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw material costs before scrap offset	Share	***	***	***	***	***
COGS: Direct labor costs before scrap offset	Share	***	***	***	***	***
COGS: Other factory costs before scrap offset	Share	***	***	***	***	***
COGS: Total before scrap offset	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Less scrap sales revenue	Unit value	***	***	***	***	***
COGS: Total including scrap offset	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Unit values shown as "0.00" represent values greater than zero, but less than "0.005" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

**Table J.4 Temporary steel fencing: Changes in AUVs between comparison periods for the merchant market**

Changes in percent; interim period is January through June

Item	2022-24	2022-23	2023-24	Interim 2024-25
Commercial sales	▼***	▼***	▲***	▼***
COGS: Raw material costs	▼***	▼***	▼***	▼***
COGS: Direct labor costs	▼***	▼***	▼***	▲***
COGS: Other factory costs	▲***	▲***	▼***	▲***
COGS: Less scrap sales revenue	▼***	▲***	▼***	▲***
COGS: Total including scrap offset	▼***	▼***	▼***	▲***

Table continued.

**Table J.4 (Continued) Temporary steel fencing: Changes in AUVs between comparison periods for the merchant market**

Changes in dollars per pound; interim period is January through June

Item	2022-24	2022-23	2023-24	Interim 2024-25
Commercial sales	▼***	▼***	▲***	▼***
COGS: Raw material costs	▼***	▼***	▼***	▼***
COGS: Direct labor costs	▼***	▼***	▼***	▲***
COGS: Other factory costs	▲***	▲***	▼***	▲***
COGS: Less scrap sales revenue	▼***	▲***	▼***	▲***
COGS: Total including scrap offset	▼***	▼***	▼***	▲***
Gross profit or (loss)	▲***	▼***	▲***	▼***
SG&A expense	▲***	▲***	▼***	▲***
Operating income or (loss)	▲***	▼***	▲***	▼***
Net income or (loss)	▼***	▼***	▲***	▼***

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

Note: Changes in unit values shown as “0.00” represent values greater than zero, but less than “0.005.” Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Figure J.4 Temporary steel fencing: Net sales values and operation income margins for the total and merchant markets, by period and market**

\* \* \* \* \*

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

Note: NS = Net sales (quantities); OM = Operating margins (in percent). Orange series are taken from part 6 of this report (total market results) and purple data are taken from this appendix (merchant market results). Removing captive production users results has the impact of removing firms that were unable to report product specific financial results matching actual revenues (i.e., from rental operations) with the cost of production in a meaningful way relative to their operations.

**Table J.5 Animal enclosure TSF: Apparent U.S. merchant market consumption and market shares based on quantity data, by source and period**

Quantity in 1,000 pounds; shares in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	23,969	15,030	15,069	10,306	7,222
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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

**Figure J.5 Animal enclosure TSF: Apparent U.S. merchant market consumption based on quantity data, by source and period**

\* \* \* \* \*

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

**Table J.6 Animal enclosure TSF: Apparent U.S. merchant market consumption and market shares based on value data, by source and period**

Value in 1,000 dollars; shares in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
China	Value	53,042	31,260	24,943	17,778	10,584
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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

**Figure J.6 Animal enclosure TSF: Apparent U.S. merchant market consumption based on value data, by source and period**

\* \* \* \* \*

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

**Figure J.7 Animal enclosure TSF: U.S. producers' share of net commercial sales quantity in 2024, by firm**

\* \* \* \* \*

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

**Table J.7 Animal enclosure TSF: U.S. producers' results of operations for the merchant market, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial sales	Quantity	***	***	***	***	***
Commercial sales	Value	***	***	***	***	***
COGS: Raw material costs	Value	***	***	***	***	***
COGS: Direct labor costs	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Less scrap sales revenue	Value	***	***	***	***	***
COGS: Total including scrap offset	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw material costs	Ratio to NS	***	***	***	***	***
COGS: Direct labor costs	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Less scrap sales revenue	Ratio to NS	***	***	***	***	***
COGS: Total including scrap offset	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

**Table J.7 (Continued) Animal enclosure TSF: U.S. producers' results of operations for the merchant market, by item and period**

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw material costs before scrap offset	Share	***	***	***	***	***
COGS: Direct labor costs before scrap offset	Share	***	***	***	***	***
COGS: Other factory costs before scrap offset	Share	***	***	***	***	***
COGS: Total before scrap offset	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Less scrap sales revenue	Unit value	***	***	***	***	***
COGS: Total including scrap offset	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

**Table J.8 Animal enclosure TSF: Changes in AUVs between comparison periods for the merchant market**

Changes in percent; interim period is January through June

Item	2022-24	2022-23	2023-24	Interim 2024-25
Commercial sales	▲***	▲***	▲***	▲***
COGS: Raw material costs	▼***	▼***	▼***	▲***
COGS: Direct labor costs	▲***	▲***	▼***	▼***
COGS: Other factory costs	▲***	▲***	▲***	▲***
COGS: Less scrap sales revenue	▲***	▲***	▼***	▲***
COGS: Total including scrap offset	▲***	▲***	▼***	▲***

Table continued.

**Table J.8 (Continued) Animal enclosure TSF: Changes in AUVs between comparison periods for the merchant market**

Changes in dollars per pound; interim period is January through June

Item	2022-24	2022-23	2023-24	Interim 2024-25
Commercial sales	▲***	▲***	▲***	▲***
COGS: Raw material costs	▼***	▼***	▼***	▲***
COGS: Direct labor costs	▲***	▲***	▼***	▼***
COGS: Other factory costs	▲***	▲***	▲***	▲***
COGS: Less scrap sales revenue	▲***	▲***	▼***	▲***
COGS: Total including scrap offset	▲***	▲***	▼***	▲***
Gross profit or (loss)	▼***	▼***	▲***	▼***
SG&A expense	▲***	▲***	▲***	▲***
Operating income or (loss)	▼***	▼***	▲***	▼***
Net income or (loss)	▼***	▼***	▲***	▼***

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

Note: Changes in unit values shown as “0.00” represent values greater than zero, but less than “0.005.” Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Figure J.8 Animal enclosure TSF: Net sales quantities and operating income margins for the total and merchant markets, by period and market**

\* \* \* \* \*

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

Note: NS = Net sales (quantities); OM = Operating margins (in percent). Orange series are taken from part 6 of this report (total market results) and purple data are taken from this appendix (merchant market results). Removing captive production users results has the impact of removing firms that were unable to report product specific financial results matching actual revenues (i.e., from rental operations) with the cost of production in a meaningful way relative to their operations. Total market OM and open market OM are nearly identical, causing the lines to overlap directly on the graph.

**Table J.9 Other TSF: Apparent U.S. merchant market consumption and market shares based on quantity data, by source and period**

Quantity in 1,000 pounds; shares in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	11,914	17,445	23,226	12,096	14,545
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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

**Figure J.9 Other TSF: Apparent U.S. merchant market consumption based on quantity data, by source and period**

\* \* \* \* \*

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

**Table J.10 Other TSF: Apparent U.S. merchant market consumption and market shares based on value data, by source and period**

Value in 1,000 dollars; shares in percent; interim period is January through June

Source	Measure	2022	2023	2024	Interim 2024	Interim 2025
U.S. producers	Value	***	***	***	***	***
China	Value	20,178	26,572	32,444	16,650	22,019
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

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

**Figure J.10 Other TSF: Apparent U.S. merchant market consumption based on value data, by source and period**

\* \* \* \* \*

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

**Figure J.11 Other TSF: U.S. producers' share of net commercial sales quantity in 2024, by firm**

\* \* \* \* \*

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

**Table J.11 Other TSF: U.S. producers' results of operations for the merchant market, by item and period**

Quantity in 1,000 pounds; value in 1,000 dollars; ratio in percent; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
Commercial sales	Quantity	***	***	***	***	***
Commercial sales	Value	***	***	***	***	***
COGS: Raw material costs	Value	***	***	***	***	***
COGS: Direct labor costs	Value	***	***	***	***	***
COGS: Other factory costs	Value	***	***	***	***	***
COGS: Less scrap sales revenue	Value	***	***	***	***	***
COGS: Total including scrap offset	Value	***	***	***	***	***
Gross profit or (loss)	Value	***	***	***	***	***
SG&A expenses	Value	***	***	***	***	***
Operating income or (loss)	Value	***	***	***	***	***
Other expense / (income), net	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw material costs	Ratio to NS	***	***	***	***	***
COGS: Direct labor costs	Ratio to NS	***	***	***	***	***
COGS: Other factory costs	Ratio to NS	***	***	***	***	***
COGS: Less scrap sales revenue	Ratio to NS	***	***	***	***	***
COGS: Total including scrap offset	Ratio to NS	***	***	***	***	***
Gross profit	Ratio to NS	***	***	***	***	***
SG&A expense	Ratio to NS	***	***	***	***	***
Operating income or (loss)	Ratio to NS	***	***	***	***	***
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

**Table J.11 (Continued) Other TSF: U.S. producers' results of operations for the merchant market, by item and period**

Shares in percent; unit values in dollars per pound; count in number of firms reporting; interim period is January through June

Item	Measure	2022	2023	2024	Interim 2024	Interim 2025
COGS: Raw material costs before scrap offset	Share	***	***	***	***	***
COGS: Direct labor costs before scrap offset	Share	***	***	***	***	***
COGS: Other factory costs before scrap offset	Share	***	***	***	***	***
COGS: Total before scrap offset	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	***	***	***	***	***
COGS: Raw material costs	Unit value	***	***	***	***	***
COGS: Direct labor costs	Unit value	***	***	***	***	***
COGS: Other factory costs	Unit value	***	***	***	***	***
COGS: Less scrap sales revenue	Unit value	***	***	***	***	***
COGS: Total including scrap offset	Unit value	***	***	***	***	***
Gross profit or (loss)	Unit value	***	***	***	***	***
SG&A expenses	Unit value	***	***	***	***	***
Operating income or (loss)	Unit value	***	***	***	***	***
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Note: Unit values shown as "0.00" represent values greater than zero, but less than "0.005" percent.

**Table J.12 Other TSF: Changes in AUVs between comparison periods for the merchant market**

Changes in percent; interim period is January through June

Item	2022-24	2022-23	2023-24	Interim 2024-25
Commercial sales	▲***	▼***	▲***	▼***
COGS: Raw material costs	▼***	▼***	▼***	▼***
COGS: Direct labor costs	▼***	▼***	▼***	▲***
COGS: Other factory costs	▲***	▲***	▼***	▲***
COGS: Less scrap sales revenue	▲***	▲***	▼***	▲***
COGS: Total including scrap offset	▼***	▼***	▼***	▲***

Table continued.

**Table J.12 (Continued) Other TSF: Changes in AUVs between comparison periods for the merchant market**

Changes in dollars per pound; interim period is January through June

Item	2022-24	2022-23	2023-24	Interim 2024-25
Commercial sales	▲***	▼***	▲***	▼***
COGS: Raw material costs	▼***	▼***	▼***	▼***
COGS: Direct labor costs	▼***	▼***	▼***	▲***
COGS: Other factory costs	▲***	▲***	▼***	▲***
COGS: Less scrap sales revenue	▲***	▲***	▼***	▲***
COGS: Total including scrap offset	▼***	▼***	▼***	▲***
Gross profit or (loss)	▲***	▼***	▲***	▼***
SG&A expense	▲***	▲***	▼***	▲***
Operating income or (loss)	▲***	▼***	▲***	▼***
Net income or (loss)	▼***	▼***	▲***	▼***

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

Note: Changes in unit values shown as “0.00” represent values greater than zero, but less than “0.005.” Period changes preceded by a “▲” represent an increase, while period changes preceded by a “▼” represent a decrease.

**Figure J.12 Other TSF: Net sales quantities and operating income margins for the total and merchant markets, by period and market**

\* \* \* \* \*

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

Note: NS = Net sales (quantities); OM = Operating margins (in percent). Orange series are taken from part 6 of this report (total market results) and purple data are taken from this appendix (merchant market results). Removing captive production users results has the impact of removing firms that were unable to report product specific financial results matching actual revenues (i.e., from rental operations) with the cost of production in a meaningful way relative to their operations.



**APPENDIX K**

**ALTERNATIVE PRICING PRODUCT:**

**PRODUCT 1 & 2 AND 3 & 4 COMBINATIONS**



This appendix shows pricing product data that combines product 1 with product 2 in table K.1. and figure K.1. (i.e, aggregate mesh and link interiors sold to fence rental companies) and product 3 with product 4 in table K.2 and figure K.2 (i.e., aggregate mesh and link interiors sold to distributors), similar to the analysis in the preliminary phase of these investigations. Tables K.3 and K.4 show instances of underselling and overselling with these product combinations, by product and period. For reference, the pricing product definitions are below:

**Product 1.**-- Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.<sup>1</sup>

**Product 2.**-- Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to fence rental companies.<sup>1</sup>

**Product 3.**-- Other temporary steel fence panel, galvanized, not powder coated, welded wire mesh interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

**Product 4.**-- Other temporary steel fence panel, galvanized, not powder coated, chain link interior, nominal size of six feet tall by ten to twelve feet long, with dimensional tolerances of plus or minus six inches, actual weight between 4 to 5 pounds per linear foot, with either a horizontal or vertical internal brace (not cross-braced), sold to distributors.

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<sup>1</sup> The Commission's questionnaire defined "fence rental companies" as any company that rents the fencing it owns to end users, whether or not bundled with other services, including but not limited to rental companies, site service providers, and fence contractors.

**Table K.1 Temporary steel fencing: Weighted-average FOB prices/unit LDP values and quantities of domestic and imported products 1 and 2 combined, and margins or differentials of underselling/(overselling)**

Quantity in linear feet; prices/unit LDP values in dollars per linear foot; margins and differentials in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	China unit LDP value	China quantity	China differential
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***
2024 Q3	***	***	***	***	***	***	***	***
2024 Q4	***	***	***	***	***	***	***	***
2025 Q1	***	***	***	***	***	***	***	***
2025 Q2	***	***	***	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—". Purchase costs data for products 1 and 2 were labeled as products 8 and 9 in the U.S. importers questionnaire but are the equivalent of U.S. producer pricing products 1 and 2.

**Figure K.1. Temporary steel fencing: Weighted-average f.o.b. prices/unit LDP values and quantities of domestic and imported products 1 and 2 combined, by source and quarter**

**Price of products 1 and 2 combined**

\* \* \* \* \*

**Volume of products 1 and 2 combined**

\* \* \* \* \*

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

**Table K.2 Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported products 3 and 4 combined, and margins of underselling/(overselling)**

Quantity in linear feet; prices in dollars per linear foot; margins in percent

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***
2024 Q3	***	***	***	***	***
2024 Q4	***	***	***	***	***
2025 Q1	***	***	***	***	***
2025 Q2	***	***	***	***	***

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

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

**Figure K.2. Temporary steel fencing: Weighted-average f.o.b. prices and quantities of domestic and imported products 3 and 4 combined, by source and quarter**

**Price of products 3 and 4 combined**

\* \* \* \* \*

**Volume of products 3 and 4 combined**

\* \* \* \* \*

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

**Table K.3. Temporary steel fencing: Instances and quantities of underselling/overselling and the range and average of margins with products 1 & 2 and 3 & 4 combined, by product**

Quantity in linear feet and units; value in dollars, margins in percent

Products	Type	Number of instances	Quantity	Value	Average margin	Min margin	Max margin
Product 1 & 2	Underselling	10	***	***	***	***	***
Product 3 & 4	Underselling	—	***	***	***	***	***
Product 5	Underselling	8	***	***	***	***	***
Product 6	Underselling	7	***	***	***	***	***
Products 1-6	Underselling	25	NA	***	***	***	***
Product 7	Underselling	14	***	***	***	***	***
All products	Underselling	39	NA	***	***	***	***
Product 1 & 2	Overselling	4	***	***	***	***	***
Product 3 & 4	Overselling	14	***	***	***	***	***
Product 5	Overselling	1	***	***	***	***	***
Product 6	Overselling	2	***	***	***	***	***
Products 1-6	Overselling	21	NA	***	***	***	***
Product 7	Overselling	—	***	***	***	***	***
All products	Overselling	21	NA	***	***	***	***

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

Note: Products 1, 2, 3, 4 and 7 (fencing) were gathered in linear feet, while products 5 and 6 (stands) were gathered in units, therefore subtotals are aggregated by value and not by quantity. Data for products 5, 6, and 7 in this table come from information shown in part 5 of this report. The combinations of products 1 & 2 and products 3 & 4 provided in this appendix closely match the product definitions used in the preliminary phase of these investigations.

Note: Instances represent the number of valid comparisons included where there was both a domestic price and subject import price comparison reported by the specified criteria. Quantity represents the quantity for the subject pricing data included in the specified comparisons. Margins present the price differences between subject product and domestic product, with positive margins indicating subject pricing was below domestic pricing and negative margins indicating subject pricing was above domestic pricing in the specified comparisons. Margins shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive, underselling) and greater than “(0.05)” percent (if negative, overselling). Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

**Table K.4: Temporary steel fencing: Instances and quantities of underselling/overselling and the range and average of margins with products 1 & 2 and 3 & 4 combined, by period**

Value in dollars; margins in percent

Period	Grouping	Type	Number of instances	Value	Average margin	Min margin	Max margin
2022	Other TSF	Underselling	—	***	***	***	***
2023	Other TSF	Underselling	8	***	***	***	***
2024	Other TSF	Underselling	12	***	***	***	***
January through June 2025	Other TSF	Underselling	5	***	***	***	***
All periods	Other TSF	Underselling	25	***	***	***	***
2022	Other TSF	Overselling	8	***	***	***	***
2023	Other TSF	Overselling	6	***	***	***	***
2024	Other TSF	Overselling	4	***	***	***	***
January through June 2025	Other TSF	Overselling	3	***	***	***	***
All periods	Other TSF	Overselling	21	***	***	***	***
2022	All TSF	Underselling	4	***	***	***	***
2023	All TSF	Underselling	12	***	***	***	***
2024	All TSF	Underselling	16	***	***	***	***
January through June 2025	All TSF	Underselling	7	***	***	***	***
All periods	All TSF	Underselling	39	***	***	***	***
2022	All TSF	Overselling	8	***	***	***	***
2023	All TSF	Overselling	6	***	***	***	***
2024	All TSF	Overselling	4	***	***	***	***
January through June 2025	All TSF	Overselling	3	***	***	***	***
All periods	All TSF	Overselling	21	***	***	***	***

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

Note: Products 1, 2, 3, 4 and 7 (fencing) were gathered in linear feet, while products 5 and 6 (stands) were gathered in units, therefore subtotals are aggregated by value and not by quantity. Data for products 5, 6, and 7 in this table come from information shown in part 5 of this report. The combinations of products 1 & 2 and products 3 & 4 provided in this appendix closely match the product definitions used in the preliminary phase of these investigations.

Note: Instances represent the number of valid comparisons included where there was both a domestic price and subject import price comparison reported by the specified criteria. Quantity represents the quantity for the subject pricing data included in the specified comparisons. Margins present the price differences between subject product and domestic product, with positive margins indicating subject pricing was below domestic pricing and negative margins indicating subject pricing was above domestic pricing in the specified comparisons. Margins shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive, underselling) and greater than “(0.05)” percent (if negative, overselling). Zeroes, null values, and undefined calculations are suppressed and shown as “—”.



## **APPENDIX L**

### **FOREIGN PRODUCER DATA FROM PRELIMINARY PHASE**



## The industry in China

During the preliminary phase investigations, one usable response to the Commission’s questionnaire was received from firm Shijiazhuang S D Company (“SD Company”). SD Company \*\*\*. SD Company’s reported 2023 exports to the United States as a share of 2023 imports from China, as reported in the preliminary phase Commission questionnaires, was \*\*\* percent.

Table L.1 presents information on the temporary steel fencing operations of SD Company in China.

**Table L.1 Temporary steel fencing: Summary data for producer SD Company in China in 2023**

Quantity in 1,000 pounds; share in percent

<b>Producer</b>	<b>Production (1,000 pounds)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 pounds)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 pounds)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
SD Company	***	***	***	***	***	***

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

## Changes in operations

Producers in China were asked to report any change in the character of their operations or organization relating to the production of temporary steel fencing since 2021. Table L.2 presents the changes identified by SD Company.

**Table L.2 Temporary steel fencing: Reported changes in operations in China since January 1, 2021, by firm**

Item	Firm name (subject foreign industry) and accompanying narrative response regarding changes in operations
Weather-related or force majeure events	***

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

## Installed and practical overall capacity

Table L.3 presents data on SD Company's installed capacity, practical overall capacity, and practical temporary steel fencing capacity and production on the same equipment. Installed and practical overall capacities each increased by \*\*\* percent from 2021 to 2023 and were each \*\*\* percent higher in interim 2024 than in interim 2023. Overall production increased by \*\*\* percent from 2021 to 2023 and was \*\*\* percent higher in interim 2024 than in interim 2023. Installed overall capacity utilization was \*\*\* percent and practical overall capacity utilization was between \*\*\* and \*\*\* percent throughout the data collection period.

**Table L.3 Temporary steel fencing: China producers' installed and practical capacity and production on the same equipment as in-scope production, by period**

Capacity and production in 1,000 pounds; utilization in percent; interim period is January through September

Item	Measure	2021	2022	2023	Interim 2023	Interim 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical Temporary steel fencing	Capacity	***	***	***	***	***
Practical Temporary steel fencing	Production	***	***	***	***	***
Practical Temporary steel fencing	Utilization	***	***	***	***	***

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

## Constraints on capacity

SD Company did not report any constraints on capacity.

## Operations on temporary steel fencing

Table L.4 presents information on the temporary steel fencing operations of SD Company. Practical temporary steel fencing capacity and production each increased by \*\*\* percent from 2021 to 2023 and capacity was \*\*\* percent higher in interim 2024 than in interim 2023, while production was \*\*\* percent higher. Capacity was projected to increase by \*\*\* percent from 2023 to 2024 and production was projected to increase by \*\*\* percent from 2024 to 2025. \*\*\* capacity \*\*\* production were projected to change from 2024 to 2025. Capacity utilization was between \*\*\* and \*\*\* percent during the data collection period and was projected to increase by \*\*\* percentage points from 2023 to 2024.

Exports to the United States accounted for between \*\*\* to \*\*\* percent of SD Company's total shipments during the data collection period. Exports to the United States increased by \*\*\* percent from 2021 to 2023 and were \*\*\* percent higher in interim 2024 than in interim 2023. Exports to the United States were projected to increase by \*\*\* percent from 2023 to 2024 and were \*\*\* projected to change between 2024 and 2025. Exports to all other markets increased by \*\*\* percent from 2021 to 2023, but were \*\*\* percent lower in interim 2024 than in interim 2023. Exports to all other markets were projected to decrease by \*\*\* percent from 2023 to 2024 and were \*\*\* projected to change from 2024 to 2025.

**Table L.4 Temporary steel fencing: Data on industry in China, by period**

Quantity in 1,000 pounds; interim period is January through September

Item	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
Beginning Inventories	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***

Table continued.

**Table L.4 (Continued) Temporary steel fencing: Data on industry in China, by period**

Shares and ratios in percent, interim period is January through September

Item	2021	2022	2023	Interim 2023	Interim 2024	Projection 2024	Projection 2025
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

## Alternative products

As shown in Table L.5, SD Company produced other products on the same equipment and machinery used to produce temporary steel fencing, including \*\*\*. Temporary steel fencing accounted for around \*\*\* of SD’s overall production during the data collection period.

**Table L.5 Temporary steel fencing: SD Company’s overall production on the same equipment as in-scope production, by period**

Quantity in 1,000 pounds; shares in percent, interim period is January through September

Product type	Measure	2021	2022	2023	Interim 2023	Interim 2024
Temporary steel fencing	Quantity	***	***	***	***	***
Out of scope fencing panels	Quantity	***	***	***	***	***
Out of scope fence stands	Quantity	***	***	***	***	***
Other out of scope products	Quantity	***	***	***	***	***
All out of scope products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Temporary steel fencing	Share	***	***	***	***	***
Out of scope fencing panels	Share	***	***	***	***	***
Out of scope fence stands	Share	***	***	***	***	***
Other out of scope products	Share	***	***	***	***	***
All out of scope products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

