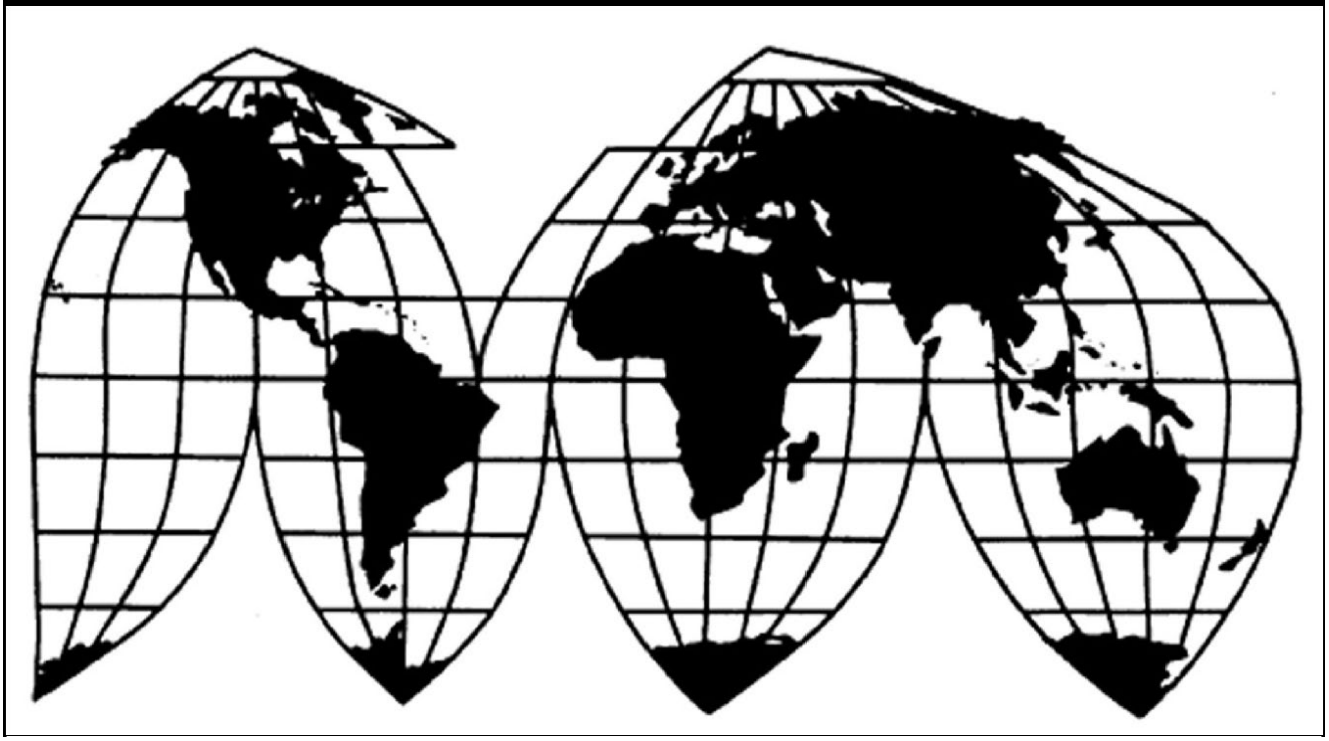
Chassis and Subassemblies from China

Investigation Nos. 701-TA-657 and 731-TA-1537 (Review)

Publication 5806 **October 2026**

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-657 and 731-TA-1537 (Review)

Chassis and Subassemblies from China

DETERMINATIONS

On the basis of the record[1] developed in the subject five-year reviews, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that revocation of the countervailing and antidumping duty orders on chassis and subassemblies from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.[2]

BACKGROUND

The Commission instituted these reviews on April 1, 2026 (91 FR 16223) and determined on July 6, 2026, that it would conduct expedited reviews (91 FR 62745, October 2, 2026).

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

[2] Commissioner Samuel T. Negatu not participating.

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended ("the Tariff Act"), that revocation of the antidumping and countervailing duty orders on chassis and subassemblies from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

A. Prior and Related Proceedings

1. The Original Investigations

In response to petitions filed on July 30, 2020, by the Coalition of American Chassis Manufacturers ("Coalition"), a trade group consisting of U.S. producers of chassis, the Commission determined in May and July 2021, respectively, that the domestic industry was materially injured by reason of imports of chassis and subassemblies from China found by the U.S. Department of Commerce ("Commerce") to be subsidized by the government of China and to be sold at less than fair value.[1] Subsequently, in May and July 2021, Commerce issued countervailing and antidumping duty orders on chassis from China.[2]

2. Related Proceedings

On February 26, 2025, the Coalition filed antidumping and countervailing duty petitions on chassis and subassemblies from Mexico, Thailand, and Vietnam.[3] In June 2026, the Commission determined that an industry in the United States was materially injured by reason

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[1] *Chassis and Subassemblies from China*, Inv. Nos. 701-TA-657 (Final), USITC Pub. 5187 (May 2021) ("*Original CVD Investigation*, USITC Pub. 5187") at 3, 57; *Chassis and Subassemblies from China*, Inv. Nos. 731-TA-1537 (Final), USITC Pub. 5211 (July 2021) ("*Original AD Investigation*), USITC Pub. 5211") at 3, 6. In the original investigations, the Coalition filed the petitions on behalf of the following five U.S. producers of chassis: Cheetah Chassis Corporation ("Cheetah"), Hercules Enterprises, LLC ("Hercules"), Pitts Enterprises, Inc. ("Pitts"), Pratt Industries, Inc. ("Pratt"), and Stoughton Trailers, LLC ("Stoughton"), and Kohler Co. ("Kohler"). *See Original CVD Investigation*, USITC Pub. 5187 at 3.

[2] *Chassis and Subassemblies From the People's Republic of China: Countervailing Duty Order and Amended Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 24844 (May 10, 2021); *Chassis and Subassemblies From the People's Republic of China: Antidumping Duty Order*, 86 Fed. Reg. 36093 (July 8, 2021).

[3] *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 3 (June 2026).

of imports of chassis and subassemblies from Mexico, Thailand, and Vietnam found by Commerce to be sold in the United States at LTFV and to be subsidized by the governments of Mexico and Thailand.[4] Subsequently, in June 2026, Commerce issued antidumping and countervailing duty orders on chassis and subassemblies from Mexico, Thailand, and Vietnam.[5]

B. The Current Reviews

On April 1, 2026, the Commission instituted these five-year reviews regarding chassis and subassemblies from China. The Coalition submitted a response to the notice of institution on behalf of two of its members, Cheetah Chassis Corporation ("Cheetah") and Stoughton Trailers, LLC ("Stoughton"), which are both domestic producers of chassis.[6] The Commission did not receive a response to the notice of institution from any respondent interested party.[7] On July 6, 2026, the Commission determined that the domestic interested party group response was adequate and that the respondent interested party group response was inadequate.[8] Finding no other circumstances warranted conducting full reviews, the Commission determined to conduct expedited reviews of the orders.[9] The Coalition filed comments with the Commission pursuant to 19 C.F.R. § 207.61(d) arguing that the Commission should reach affirmative determinations.[10]

U.S. industry data are based on information supplied by the Coalition, information from the original investigations, and information from the recently completed final phase investigations in *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 (June 2026).[11] The Coalition estimates that its two members (Cheetah and Stoughton) and another domestic producer, ***

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[4] *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 3 (June 2026). The Commission's affirmative final determinations regarding chassis and subassemblies from Mexico, Thailand, and Vietnam are currently on appeal before the U.S. Court of International Trade. *See* Mem. GC-YY-123 (July 22, 2026).

[5] *See* Confidential Adequacy Report, INV-YY-095, EDIS Doc. 885976 (June 23, 2026) ("CR") at 1.2-1.3; *Chassis and Subassemblies from China*, Inv. Nos. 701-TA-657 and 731-TA-1537 (Review), USITC Pub. 5806 (Oct. 2026) ("PR") at 1.2-1.3.

[6] *See generally* Coalition's Response to Notice of Institution, EDIS Doc. No. 881017 (May 1, 2026) ("Coalition's Resp.").

[7] CR/PR at B.3 & Table B.1; *Explanation of Commission Determination on Adequacy*, EDIS Doc. No. 889409 (July 27, 2026) ("Commission's Adequacy Explanation") at 1.

[8] Commission's Adequacy Explanation at 1.

[9] Commission's Adequacy Explanation at 1.

[10] Coalition's Comments on Adequacy, EDIS Doc. No. 884617 (June 9, 2026) ("Coalition's Adequacy Comments") at 5.

[11] CR/PR at 1.20-1.21.

collectively accounted for approximately *** percent of U.S. production of chassis and subassemblies in 2025.[12] U.S. import data and related information are based on Commerce's official import statistics and information from the original investigations.[13] Foreign industry data and related information are based on information from the original investigations, information submitted by the Coalition in these expedited reviews, and publicly available information compiled by the Commission.[14]

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the "domestic like product" and the "industry."[15] The Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle."[16] The Commission's practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.[17]

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

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[12] CR/PR at 1.21 n.31; Coalition's Supplemental Response to Notice of Institution at 1, EDIS Doc. 883062 (May 22, 2026). The Coalition provided certain trade and financial information for domestic producers Cheetah, Stoughton, and ***. CR/PR at 1.21 n.31. Accordingly, domestic industry data in these reviews for 2025 consists of data for all three firms. *See* CR/PR at Table 1.5 & note.

[13] *See* CR/PR at 1.25 & Table 1.6 Note. Compiled from official Commerce statistics for HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060. *Id*. at Table 1.6 Note. Staff believes that most of these imports represent out-of-scope merchandise. *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 2.13 (June 2026).

[14] *See* CR/PR at 1.27-1.29.

[15] 19 U.S.C. § 1677(4)(A).

[16] 19 U.S.C. § 1677(10); *see*, *e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

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

The merchandise covered by this order consists of chassis and subassemblies thereof, whether finished or unfinished, whether assembled or unassembled, whether coated or uncoated, regardless of the number of axles, for carriage of containers, or other payloads (including self-supporting payloads) for road, marine roll-on/roll-off (RORO) and/or rail transport. Chassis are typically, but are not limited to, rectangular framed trailers with a suspension and axle system, wheels and tires, brakes, a lighting and electrical system, a coupling for towing behind a truck tractor, and a locking system or systems to secure the shipping container or containers to the chassis using twistlocks, slide pins or similar attachment devices to engage the corner fittings on the container or other payload.

Subject merchandise includes, but is not limited to, the following subassemblies:

- Chassis frames, or sections of chassis frames, including kingpin assemblies, bolsters consisting of transverse beams with locking or support mechanisms, goosenecks, drop assemblies, extension mechanisms and/or rear impact guards;

- Running gear assemblies or axle assemblies for connection to the chassis frame, whether fixed in nature or capable of sliding fore and aft or lifting up and lowering down, which may or may not include suspension(s) (mechanical or pneumatic), wheel end components, slack adjusters, axles, brake chambers, locking pins, and tires and wheels;

- Landing gear assemblies, for connection to the chassis frame, capable of supporting the chassis when it is not engaged to a tractor; and

- Assemblies that connect to the chassis frame or a section of the chassis frame, such as, but not limited to, pintle hooks or B-trains (which include a fifth wheel), which are capable of connecting a chassis to a converter dolly or another chassis.

Importation of any of these subassemblies, whether assembled or unassembled, constitutes an unfinished chassis for purposes of this order.

Subject merchandise also includes chassis, whether finished or unfinished, entered with or for further assembly with components such as, but not limited to: Hub and drum assemblies, brake assemblies (either drum or disc), axles, brake chambers, suspensions and suspension components, wheel end components, landing gear legs, spoke or disc wheels, tires, brake control systems, electrical harnesses and lighting systems.

Processing of finished and unfinished chassis and components such as trimming, cutting, grinding, notching, punching, drilling, painting, coating, staining, finishing, assembly, or any other processing either in the country of manufacture of the in-scope product or in a third country does not remove the product from the scope. Inclusion of other components not identified as comprising the finished or unfinished chassis does not remove the product from the scope.

Individual components entered and sold by themselves are not subject to the order, but components entered with or for further assembly with a finished or unfinished chassis are subject merchandise. A finished chassis is ultimately comprised of several different types of subassemblies. Within each subassembly there are numerous components that comprise a given subassembly.

This scope excludes dry van trailers, refrigerated van trailers and flatbed trailers. Dry van trailers are trailers with a wholly enclosed cargo space comprised of fixed sides, nose, floor and roof, with articulated panels (doors) across the rear and occasionally at selected places on the sides, with the cargo space being permanently incorporated in the trailer itself. Refrigerated van trailers are trailers with a wholly enclosed cargo space comprised of fixed sides, nose, floor and roof, with articulated panels (doors) across the rear and occasionally at selected places on the sides, with the cargo space being permanently incorporated in the trailer and

> being insulated, possessing specific thermal properties intended for use with self-contained refrigeration systems. Flatbed (or platform) trailers consist of load-carrying main frames and a solid, flat or stepped loading deck or floor permanently incorporated with and supported by frame rails and cross members.
>
> The finished and unfinished chassis subject to this investigation are typically classified in the Harmonized Tariff Schedule of the United States (HTSUS) at subheadings: 8716.39.0090 and 8716.90.5060. Imports of finished and unfinished chassis may also enter under HTSUS subheading 8716.90.5010. While the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise under investigation is dispositive.[18]

Chassis are skeletal rectangular-framed trailers used to transport shipping containers.[19] The rectangular frame consists of steel with a suspension and axle system, wheels and tires, brakes, a lighting and electrical system, a coupling for towing behind a truck tractor, and a locking system or systems to secure the shipping container or containers attached to the chassis.[20] Chassis carry containers of various sizes, usually ranging from 20 feet to 53 feet in the United States.[21] The majority of chassis in the United States involve 20- and 40-foot chassis, although in recent years demand for 53-foot chassis increased.[22] The scope of the orders also includes chassis subassemblies (chassis frames, running gear assemblies, landing gear assemblies, and assemblies that connect to the chassis frame).[23]

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[18] *Chassis and Subassemblies Thereof From the People's Republic of China: Final Results of the Expedited First Sunset Review of the Antidumping Duty Order,* 91 Fed. Reg. 49423 (Aug. 4, 2026) ("*Commerce's First Five-Year Review Final Results – Antidumping Duty Order*") and accompanying Issues and Decision Memorandum, Case No. A-570-135 (July 30, 2026) ("AD IDM") at 2-3; *see also Chassis and Subassemblies Thereof From the People's Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order,* 91 Fed. Reg. 47814 (July 29, 2026) ("*Commerce's First Five-Year Review Final Results – Countervailing Duty Order*") and accompanying Issues and Decision Memorandum, Case No. C-570-136 (July 24, 2026) ("CVD IDM") at 2-3; s*ee also* CR/PR at 1.3-1.6. The scope of the orders has not changed since the original investigations. *See Original CVD Investigation*, USITC Pub. 5187 at 8-10 & *Original AD Investigation*, USITC Pub. 5211 at 3-4; *see also* CR/PR at 1.3-1.6 & 1.10-1.20.

[19] CR/PR at 1.10.

[20] CR/PR at 1.10.

[21] CR/PR at 1.10.

[22] CR/PR at 1.10.

[23] CR/PR at 1.12.

In the original investigations, the Commission defined a single domestic like product consisting of chassis and subassemblies, coextensive with Commerce's scope.[24] Specifically, it applied a semi-finished like product analysis and found that subassemblies should be included in the same domestic like product as finished chassis.[25]

In the current reviews, the Coalition argues that the Commission should define a single domestic like product as it did in the original investigations.[26] No new record information suggests changes in the pertinent product characteristics and uses of chassis since the prior proceedings.[27] Accordingly, we again define a single domestic like product consisting of chassis and subassemblies, coextensive with Commerce's scope.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."[28] In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

In the original investigations, the Commission found that the domestic industry consisted of all U.S. producers of chassis and subassemblies thereof, but that firms assembling

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[24] *Original CVD Investigation*, USITC Pub. 5187 at 11-18; *see also* CR/PR at 1.24.

[25] *Original CVD Investigation*, USITC Pub. 5187 at 11-18. While acknowledging that no individual subassembly or component had the same physical characteristics and functions as a complete chassis or other types of subassemblies or components, the Commission observed that the record indicated that the physical characteristics and functions of the four major subassemblies (and the components of which they are comprised) did not appear to change significantly when welded and assembled together to form a completed chassis. *Id*. at 17. The Commission found that the record also indicated no distinct market for domestically produced subassemblies and components, especially in light of the commercial sales by domestic producers of such items for repair or replacement of parts. *Id*. at 18. Moreover, the Commission found that most of the COGS of fully assembled chassis reflects the combined cost of subassemblies and components. *Id*. Finally, the Commission found that the process to transform components into subassemblies appeared to be more significant than the process to assemble subassemblies (and the components of which they are comprised) into full chassis. *Id*. In light of these considerations, the Commission found that a clear line does not divide subassemblies and components from completed chassis. *Id*.

[26] Coalition's Resp. at 18.

[27] *See generally* CR/PR at 1.3-1.6 & 1.10-1.20. *See also* Coalition's Resp. at 18.

[28] 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. *See* 19 U.S.C. § 1677.

subassemblies into complete chassis did not engage in sufficient production-related activities to be considered domestic producers of chassis and subassemblies.[29]

In the current reviews, the Coalition agrees with the domestic industry definition in the original investigations.[30] Given our domestic like product definition, and in the absence of party argument to the contrary, we again define a single domestic industry consisting of all domestic producers of chassis and subassemblies thereof, but not including subassembly assembly operations.

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

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order "would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time."[31] The Uruguay Round Agreements Act Statement of Administrative Action ("SAA") states that "under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports."[32] Thus, the likelihood standard is prospective in

[29] *Original CVD Investigation*, USITC Pub. 5187 at 19-25. In the original investigations, the Commission applied its traditional factors for sufficient production-related activities and found CIE Intermodal Equipment, LLC ("CIE") operations assembling subassemblies into complete chassis insufficient to constitute domestic production of chassis. *Id*. at 20-25. Based on its finding that CIE was not a domestic producer, the Commission also found no related parties issues. *Id*. at 25 & n.101. Accordingly, it defined the domestic industry as to encompass all domestic producers of chassis and subassemblies, but not to include CIE's assembly operations. *Id*. at 25.

[30] *See* Coalition's Resp. at 18.

[31] 19 U.S.C. § 1675a(a).

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

nature.[33] The U.S. Court of International Trade has found that "likely," as used in the five-year review provisions of the Act, means "probable," and the Commission applies that standard in five-year reviews.[34]

The statute states that "the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time."[35] According to the SAA, a "'reasonably foreseeable time' will vary from case-to-case, but normally will exceed the 'imminent' timeframe applicable in a threat of injury analysis in original investigations."[36]

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to "consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated."[37] It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).[38] The statute further provides

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

[34] *See NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int'l Trade 2003) ("'likely' means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)"), *aff'd mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) ("more likely than not" standard is "consistent with the court's opinion;" "the court has not interpreted 'likely' to imply any particular degree of 'certainty'"); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) ("standard is based on a likelihood of continuation or recurrence of injury, not a certainty"); *Usinor v. United States*, 26 CIT 767, 794 (2002) ("'likely' is tantamount to 'probable,' not merely 'possible'").

[35] 19 U.S.C. § 1675a(a)(5).

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

[37] 19 U.S.C. § 1675a(a)(1).

[38] 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings. *See Chassis and Subassemblies From the People's Republic of China: Final Results of the Expedited First Sunset*

that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.[39]

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.[40] In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.[41]

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.[42]

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or

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Review of the Antidumping Duty Order, 91 Fed. Reg. 49423 (Aug. 4, 2026) and accompanying Issues and Decision Memorandum at 3.

[39] 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

[40] 19 U.S.C. § 1675a(a)(2).

[41] 19 U.S.C. § 1675a(a)(2)(A-D).

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

more advanced version of the domestic like product.[43] All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.[44]

As noted, the Commission did not receive a response to the notice of institution from any respondent party that imported the subject merchandise from China.[45] The record, therefore, contains limited new information with respect to the chassis industry in China and the chassis market in the United States during the period of review ("POR"). Accordingly, for our determinations, we rely as appropriate on the facts available from the original investigations, and the limited new information on the record in these reviews.

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."[46] We have considered our findings regarding the conditions of competition in the original investigations.[47] The following conditions of competition inform our determinations in these reviews.

i. Demand

The record in these reviews continues to indicate that U.S. demand for chassis depends on trends in overall U.S. containerized shipping, including truck, marine, and rail freight movement in the United States because chassis are used to transport shipping containers.[48] By value, apparent U.S. consumption of chassis and subassemblies is estimated at $*** in 2025.[49]

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[43] 19 U.S.C. § 1675a(a)(4).

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

[45] Commission's Adequacy Explanation at 1.

[46] 19 U.S.C. § 1675a(a)(4).

[47] *Original CVD Investigation*, USITC Pub. 5187 at 29-38.

[48] *Original CVD Investigation*, USITC Pub. 5187 at 29; CR/PR at 1.10.

[49] That figure is calculated based on interim data for January-September 2025. See *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 4.28 (June 2026). We present value data for apparent U.S. consumption since

This was lower than in 2020, the last full year of the original investigations, at $***.[50] The Coalition argues that a surge in nonsubject imports from Mexico, Thailand, and Vietnam during the POR created an oversupply of chassis in the U.S. market that led to low levels of apparent U.S. consumption of chassis and subassemblies.[51]

ii. Supply

Based on the available data, domestic producers represented the largest source of chassis and subassemblies in the U.S. market in 2025, accounting for 70.3 percent of apparent U.S. consumption in the first nine months of that year.[52] During the POR, Stoughton opened a production plant at its facility in Waco, Texas, and installed a new production line at its facility in Stoughton, Wisconsin, while Stoughton and Cheetah issued product recalls due to performance and safety issues regarding their chassis.[53]

Nonsubject imports represented the second largest source of chassis in the U.S. market in 2025, accounting for *** percent of apparent U.S. consumption in the first nine months of that year.[54] The largest sources of nonsubject imports under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 included Mexico and Canada in 2025, followed by Taiwan, Thailand, and Vietnam.[55] As discussed above, antidumping and countervailing duty orders currently cover nonsubject imports from Mexico, Thailand, and Vietnam.[56]

Subject imports of chassis in the U.S. market are estimated to have been minimal in

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it is the best information available in these expedited first reviews. As the Adequacy Report indicates, the unit of quantity for HTS statistical reporting number 8716.39.0090 (*i.e.*, completed chassis) is units, while the unit of quantity for HTS statistical reporting number 8716.90.5060 (*i.e.*, parts of subassemblies of chassis) is kilograms. CR/PR at Table 1.7 (Note). Given these different quantity metrics, the import data for the review period are presented in terms of value. *Id*. We lack a comparative data series for apparent U.S. consumption by quantity since the original investigations. *Original CVD Investigation*, USITC Pub. 5187 at 31-33.

[50] CR/PR at Table 1.7.

[51] Coalition's Resp. at 15-16.

[52] *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 4.28 (June 2026).

[53] CR/PR at Table 1.4.

[54] *Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 4.28 (June 2026).

[55] CR/PR at 1.25 & Table 1.6. Staff believes that most U.S. imports under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 represent out-of-scope merchandise. *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 2.13 (June 2026).

[56] CR/PR at 1.2-1.3.

2024 and 2025.[57] However, subject imports under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 were the second largest in the U.S. market in 2025, after Mexico.[58]

iii. Substitutability and Other Conditions

In the original investigations, the Commission characterized domestically produced chassis and subject imports as moderately-to-highly substitutable.[59] It also identified price as an important factor in purchasing decisions for chassis.[60]

The record of these reviews contains no new information indicating changes in substitutability or the importance of price since the original investigations,[61] and the Coalition does not argue otherwise.[62] Based on the limited information available, we again find at least a moderate-to-high degree of substitutability between domestically produced chassis and subject imports, and that price is an important factor in purchasing decisions for chassis.

Effective April 6, 2026, pursuant to section 232 of the Trade Expansion Act of 1962 ("Section 232"), as amended, chassis originating in China and provided for in HTS subheadings 8716.39.00 and 8716.90.50 faced an additional 25 percent *ad valorem* duty, applied to the full customs value of the imported article.[63] Effective May 10, 2019, chassis originating in China for HTS subheadings 8716.39.00 and 8716.90.50 faced an additional 25 percent *ad valorem* duty under section 301 of the Trade Act of 1974 ("Section 301").[64] As of April 6, 2026, chassis originating in China provided for in HTS subheadings 8716.39.00 and 8716.90.50 no longer face

[57] *** in 2024. In the first nine months of 2025, the share of nonsubject imports (including China) stood at *** percent. *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 4.2 and 4.28 (June 2026).

[58] CR/PR at Table 1.6. Staff believes that most U.S. imports under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 represent out-of-scope merchandise. *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 2.13 (June 2026).

[59] *Original CVD Investigation*, USITC Pub. 5187 at 34-35.

[60] *Original CVD Investigation*, USITC Pub. 5187 at 35-36.

[61] *See generally* CR/PR; Coalition's Resp. at 12; Coalition's Adequacy Comments at 4.

[62] Coalition's Resp. at 10, 12 & Coalition's Adequacy Comments at 4.

[63] CR/PR at 1.7 & n.17, Table 1.3. Between August 18, 2025, and April 6, 2026, chassis originating in China faced an additional 50 percent *ad valorem* duty under Section 232, applied to the declared value of the steel content of the imported Article. CR/PR at 1.7 n.17. Before April 6, 2026, chassis provided for in HTS subheading 8716.90.50 did not face an additional *ad valorem* duty under Section 232. *Id*.

[64] CR/PR at 1.8, Table 1.3. Between September 24, 2018, and May 10, 2019, chassis originating in China for HTS subheadings 8716.39.00 and 8716.90.50 faced an additional 10 percent *ad valorem* duty under Section 301. *Id*. at 1.8.

duties pursuant to section 122 of the Trade Act of 1974 ("Section 122").[65]

C. Likely Volume of Subject Imports

We considered our findings regarding the volume of subject imports in the original investigations.[66] In the original investigations, the Commission concluded that the volume of subject imports was significant both in absolute terms and relative to apparent U.S. consumption.[67] In particular, the Commission focused on the volume of subject imports as measured by value, which were $*** in 2018, $*** in 2019, and $*** in 2020.[68] It also referred to subject imports' share of apparent U.S. consumption, by value, of *** percent in 2018, *** percent in 2019, and *** percent in 2020.[69] In these reviews, the volume of subject imports as measured by value under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 was $550.8 million in 2021, $614.6 million in 2022, $476.0 million in 2023, $433.6 million in 2024, and $407.9 million in 2025.[70] As discussed above, staff believes that most U.S. imports under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 represent out-of-scope merchandise and that subject imports were minimal in 2024–25.[71] We find that the orders have a disciplining effect on subject imports, given that subject imports of chassis have declined since the original investigations.

While the record in these five-year reviews contains limited information on the subject foreign industry, the information available indicates that subject foreign producers have the ability and incentive to increase significantly their exports of chassis to the U.S. market if the orders were revoked. The Coalition identified four possible producers of chassis in China.[72]

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[65] CR/PR at 1.8 & n.20, Table 1.3. Effective February 24, 2026, chassis originating in China provided for in HTS subheadings 8716.39.00 and 8716.90.50 faced an additional 10 percent *ad valorem* duty under Section 122. CR/PR at 1.8 n.20. For chassis provided for under subheading 8716.39.00, the Section 122 duty applied only to any non-steel content. *Id*. Effective April 6, 2026, chassis originating in China provided for in HTS subheadings 8716.39.00 and 8716.90.50 no longer face Section 122 duties because Section 232 tariffs apply to the full customs value of the products. *Id.* In addition, between February 4, 2025, and February 20, 2026, chassis originating in China faced varying additional duties under the International Emergency Economic Powers Act ("IEEPA"). CR/PR at 1.9-1.10.

[66] *Original CVD Investigation*, USITC Pub. 5187 at 39-40.

[67] *Original CVD Investigation,* USITC Pub. 5187 at 40.

[68] CR/PR at Table 1.7.

[69] CR/PR at Table 1.7.

[70] CR/PR at Table 1.6 & 1.7. *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 2.13 (June 2026).

[71] *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 2.13, 4.2, and 4.28 (June 2026).

[72] CR/PR at 1.27; Coalition's Resp. at Exh. 1.

The Coalition also stated that Chinese producer China International Marine Containers ("CIMC") has 34 manufacturing plants and service bases, which have significant capacity. Specifically, CIMC reported annual production capacity exceeding 200,000 units of various special-purpose vehicles, including one facility with an annual production capacity of more than 60,000 trailers and another with reportedly substantial capacity to produce "container chassis."[73] The record in these reviews thus shows that, since the original investigations, the chassis industry in China has maintained significant production capacity and could shift production from out-of-scope product to subject merchandise, enabling it to ship large volumes of chassis to the U.S. market, if the orders were revoked.

The record in these reviews indicates that the subject industry exports substantial quantities of merchandise under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 and views the United States as an attractive export market.[74] Additionally, Global Trade Atlas ("GTA") data for HS subheadings 8716.39 and 8716.90, categories that also include chassis and out-of-scope products, identifies China as the second-largest global exporter of such merchandise by value for most of the review period.[75] China's global exports of such merchandise increased from $1.9 billion in 2020 to $3.6 billion in 2025.[76] GTA data also identify the United States as by far the top export destination for such products from China by value throughout the review period, even though China's exports to the United States of such merchandise fluctuated and declined irregularly during the review period, falling from $536.9 million in 2020 to $415.5 million in 2025.[77] Further, three of the subsidy programs Commerce found were likely to continue or recur constituted export subsidy programs within the meaning of Article 3.1 of the World Trade Organization Agreement on Subsidies and Countervailing Measures.[78] Such programs would incentivize exports if the orders were revoked. In addition, the existence of antidumping duty orders on subject merchandise in other countries will likely make the U.S. market attractive, if the order were revoked. Specifically, in February 2022, chassis from China became subject to antidumping duties in Canada, which remain in effect.[79]

Thus, subject producers have the means and the incentive to export subject

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[73] *See* Coalition's Resp. at 8-9; *see also* Coalition's Adequacy Comments at 4.

[74] CR/PR at Table 1.6 & 1.7. Staff believes that most U.S. imports under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 represent out-of-scope merchandise. *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 2.13 (June 2026).

[75] CR/PR at Table 1.10.

[76] CR/PR at Table 1.10.

[77] CR/PR at Table 1.9.

[78] CVD IDM at 3.

[79] CR/PR at 1.28.

merchandise to the U.S. market in significant volumes within a reasonably foreseeable time if the orders were revoked. In light of these considerations, the subject industry's substantial capacity and exports, and the attractiveness of the U.S. market to subject producers, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.[80]

D. Likely Price Effects of Subject Imports

We considered our findings regarding the price effects of subject imports in the original investigations.[81] As noted above, the Commission found a moderate-to-high degree of substitutability between subject imports from China and the domestic like product, and that price was an important purchasing factor.[82]

In the original investigations, the Commission found that subject imports undersold the domestic like product in virtually all available quarterly price comparisons.[83] Purchasers further reported lower prices for subject imports than the domestic like product and that they made a substantial share of their purchases of subject imports based primarily on lower prices.[84] In light of this evidence, the Commission found that significant underselling by subject imports and that the significant underselling caused a shift in market share from the domestic industry to subject imports during the period of investigation.[85]

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[80] The existence of Section 301 duties of 25 percent *ad valorem*, since 2019 did not deter the importation of imports under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 during either the original investigations or the current review period. We also recognize that additional tariffs imposed under various authorities in 2025 and 2026, identified above in section IV.B.iii, may have had an effect on the volume of imports of subject merchandise in those years but do not explain reduced volumes of subject imports in earlier years. We also note that tariffs under these authorities are not directed at remedying the injurious effects of dumped and subsidized imports, and subject to change. Therefore, we find that the additional tariffs will not prevent imports from increasing if the antidumping and countervailing duty orders were revoked.

We observe that the record in these expedited reviews contains no information concerning inventories of the subject merchandise or the potential for product shifting.

[81] *Original CVD Investigation*, USITC Pub. 5187 at 40-48.

[82] *Original CVD Investigation*, USITC Pub. 5187 at 40.

[83] *Original CVD Investigation*, USITC Pub. 5187 at 41-42. More specifically, subject imports undersold the domestic like product in 58 of 61 (or 95.0 percent) of quarterly comparisons at margins ranging from 4.3 to 55.4 percent; the quantity of subject imports in these underselling comparisons was 44,679 chassis. *Id*. By comparison, subject imports consisting of three chassis oversold the domestic like product in the remaining three comparisons at margins ranging from 0.6 to 17.7 percent. *Id*.

[84] *Original CVD Investigation*, USITC Pub. 5187 42-43.

[85] *Original CVD Investigation*, USITC Pub. 5187 at 44.

The Commission also found that low-priced subject imports prevented increases in the prices for the domestic like product which otherwise would have occurred to a significant degree.[86] Specifically, the Commission found the increase in the domestic industry's unit sales value inadequate to cover the increase in its unit COGS during 2018-2019 and that the domestic industry's unit sales value declined more than its unit COGS during 2019-2020.[87] Accordingly, the Commission found that the domestic industry was unable to increase its prices sufficiently to cover its costs since its COGS-to-net-sales ratio deteriorated over the period of investigation, increasing from *** percent in 2018 to *** percent in 2019 and *** percent in 2020.[88]

Based on the foregoing, Commission found that the subject imports had significant effects on prices for the domestic like product.[89]

The record in these expedited five-year reviews does not contain recent product-specific pricing information. Based on the available information, including the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, we find that, if the order were revoked, subject imports would likely significantly undersell the domestic like product, as occurred in the original investigations.[90] Absent the discipline of the orders, the likely significant volumes of low-priced subject imports would likely take sales and market share from the domestic industry and/or force the domestic industry to lower prices or restrain any needed price increases, thereby depressing or suppressing prices for the domestic like product. Consequently, we find that if the orders were revoked, subject imports would likely have significant price effects.

[86] *Original CVD Investigation*, USITC Pub. 5187 at 47.

[87] *Original CVD Investigation*, USITC Pub. 5187 at 45.

[88] *Original CVD Investigation*, USITC Pub. 5187 at 44 & 46-47; *Conf. Views Original CVD Investigation* at 47 (EDIS Doc. 882601).

[89] *Original CVD Investigation*, USITC Pub. 5187 at 48.

[90] *Original CVD Investigation*, USITC Pub. 5187 at 41-42 & 48.

E. Likely Impact of Subject Imports[91]

We considered our findings regarding the impact of subject imports in the original investigations.[92] The record in these five-year reviews contains limited information concerning the domestic industry's performance since the period examined in the original investigations.[93]

In these reviews, the domestic industry reported capacity of *** units, production of *** units, and capacity utilization of *** percent in 2025.[94] Additionally, in 2025, the domestic industry reported U.S. shipments by quantity and value of *** units and $***, respectively.[95] The domestic industry reported net sales value of $*** and a cost of goods sold ("COGS") of $*** in 2025; its ratio of COGS to net sales was *** percent.[96] In addition, the domestic industry reported gross profits, operating income and operating income margin of ***, ***, and *** percent, respectively, in 2025.[97] As noted data coverage differs between the original investigations and the current reviews, limiting the probative value of comparing the data from

[91] In its expedited review of the antidumping duty order on chassis from China, Commerce determined that revocation of the antidumping duty order would likely result in the continuation or recurrence of dumping with margins of up to 188.05 percent. *Commerce's Five-Year Review Final Results – AD Order*, 91 Fed. Reg. at 49424. In its expedited five-year review of the countervailing duty order on chassis from China, Commerce determined that revocation of the countervailing duty order would likely result in the continuation or recurrence of subsidy rates of up to 44.32 percent *ad valorem*. *Commerce's Five-Year Review Final Results – CVD Order*, 91 Fed. Reg. at 47815.

[92] *Original CVD Investigation*, USITC Pub. 5187 at 48-57.

[93] CR/PR at Table 1.5.

[94] CR/PR at Table 1.5. U.S. producers' data for 2025 are compiled from the domestic interested party's response to the notice of institution, and account for *** percent of domestic production of chassis in 2025 (inclusive of data provided by ***). As a result, capacity and production data are understated. For the chassis industry as a whole, practical chassis capacity reached 47,650 units in the first nine months of 2025, while production stood at 6,869 units and capacity utilization was 14.4 percent. *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 3.6 (June 2026).

[95] CR/PR at Table 1.5. U.S. producers' data for 2025 are compiled from the domestic interested party's response to the notice of institution, and account for *** percent of domestic production of chassis in 2025 (inclusive of data provided by ***). As a result, U.S. shipments data are likely understated. For the chassis industry as a whole, commercial U.S. shipments reached *** units in the first nine months of 2025, with a value of $*** million. *Chassis and Subassemblies from Mexico, Thailand, and Vietnam,* Inv. No. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Pub. 5742 at 3.12 (June 2026).

[96] CR/PR at Table 1.5. U.S. producers' data for 2025 are compiled from the domestic interested party's response to the notice of institution, and account for *** percent of domestic production of chassis in 2025 (inclusive of data provided by ***).

[97] CR/PR at Table 1.5. U.S. producers' data for 2025 are compiled from the domestic interested party's response to the notice of institution, and account for *** percent of domestic production of chassis in 2025 (inclusive of data provided by ***).

these reviews regarding the domestic industry's performance (particularly absolute numbers) and data from the original investigation. Moreover, we observe mixed trade and financial indicators for the domestic industry, with higher production, shipments, net sales, and gross profits in 2025 than in 2020 (the last full year of the original POI)[98] and lower capacity, operating income, and operating income margin in 2025 than in 2020.[99] The limited new information on the record of these expedited reviews suggests that the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the orders.

Regardless, based on the information available on the record, we find that revocation of the orders would likely result in a significant volume of subject imports that would significantly undersell the domestic like product, as occurred in the original investigations. Given the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or force domestic producers to lower their prices or forgo any needed price increases in order to maintain their sales, thereby significantly depressing or suppressing prices for the domestic like product. The domestic industry would thus experience negative effects on its capacity, production, capacity utilization, shipments, and market share, which would in turn negatively impact the industry's profitability and employment. Consequently, we conclude that if the orders were revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

We also considered the role of factors other than subject imports, including the presence of nonsubject imports, so as to not attribute likely injury from other factors to subject imports. As discussed previously, the facts available show that nonsubject imports increased their presence in the U.S. market since the original investigations.[100] The record in these reviews, however, provides no indication that the presence of nonsubject imports would prevent low priced subject imports from significantly increasing their presence in the U.S. market, as occurred in the original investigations, upon revocation of the orders, especially given the orders on Mexico, Thailand, and Vietnam that were imposed in June 2026. Consequently, we find that any future effects of nonsubject imports would not preclude the likely effects attributable to subject imports.

[98] This is true even despite the smaller number of responses.

[99] CR/PR at Table 1.5. The reduction in capacity was likely influenced by the smaller number of responses.

[100] *See* CR/PR at Table 1.7.

As discussed above in Section III.B.i., the Coalition argues that U.S. demand for chassis and subassemblies is likely to remain low within the reasonably foreseeable future as a result of surge in nonsubject imports from Mexico, Thailand, and Vietnam that created an oversupply of chassis in the U.S. market during the POR.[101] Given the moderate-to-high degree of substitutability between subject imports and the domestic like product and the importance of price to purchasers, the significant volume of low-priced subject imports that is likely after revocation would exacerbate any effects of decreasing demand on the domestic industry, by further reducing the industry's sales and placing additional downward pressure on domestic prices.

Accordingly, we conclude that if the antidumping and countervailing duty orders were revoked, subject imports from China would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

IV. Conclusion

For the reasons discussed above, we determine that revocation of the antidumping and countervailing duty orders on chassis and subassemblies from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

[101] Coalition's Resp. at 15-16.

Information obtained in these reviews

Background

On April 1, 2026, the U.S. International Trade Commission ("Commission") gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended ("the Act"),[1] that it had instituted reviews to determine whether revocation of antidumping and countervailing duty orders on chassis and subassemblies ("chassis") from China would be likely to lead to the continuation or recurrence of material injury to a domestic industry.[2] All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.[3] Table 1.1 presents information relating to the background and schedule of this proceeding:

Table 1.1 Chassis: Information relating to the background and schedule of this proceeding

Effective date	Action
April 1, 2026	Notice of initiation by Commerce (91 FR 16181, April 1, 2026)
April 1, 2026	Notice of institution by Commission (91 FR 16223, April 1, 2026)
July 6, 2026	Commission's vote on adequacy
July 29, 2026	Commerce's results of its expedited reviews of the countervailing duty order (91 FR 47814, July 29, 2026)
August 4, 2026	Commerce's results of its expedited reviews of the antidumping duty order (91 FR 49423, August 4, 2026)
October 29, 2026	Commission's determinations and views

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

[2] 91 FR 16223, April 1, 2026. In accordance with section 751(c) of the Act, the U.S. Department of Commerce ("Commerce") published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 91 FR 16181, April 1, 2026. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission's website (www.usitc.gov).

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

The original investigations

The original investigations resulted from petitions filed on July 30, 2020, with Commerce and the Commission by the Coalition of American Chassis Manufacturers, comprised of Cheetah Chassis Corporation, Fairless Hills, Pennsylvania; Hercules Enterprises, LLC, Hillsborough, New Jersey; Pitts Enterprises, Inc., Pittsview, Alabama; Pratt Industries, Inc., Bridgman, Michigan; and Stoughton Trailers, LLC, Stoughton, Wisconsin.[4] The investigations became staggered when Commerce did not align its countervailing duty investigation with its antidumping duty investigation.[5] On March 22, 2021, Commerce determined that imports of chassis from China were subsidized by the Government of China.[6] The Commission determined on May 3, 2021, that the domestic industry was materially injured by reason of subsidized imports of chassis from China.[7] On May 10, 2021, Commerce issued its countervailing duty order with a net subsidy rate of 44.32 percent for chassis from China.[8] On May 17, 2021, Commerce determined that imports of chassis from China were being sold at less than fair value ("LTFV").[9] The Commission determined on July 2, 2021, that the domestic industry was materially injured by reasons of LTFV imports of chassis from China,[10] and Commerce issued its antidumping duty order with final weighted-average dumping margin of 177.05 percent for chassis from China.[11]

Previous and related investigations

Following the Commission's determinations in the original investigations, the Commission has conducted antidumping duty investigations covering imports of chassis from Mexico, Thailand, and Vietnam, and countervailing duty investigations covering imports of chassis subsidized by the Governments of Mexico and Thailand. On June 18, 2026, Commerce issued its antidumping duty orders with final weighted-average margins of 32.37 percent, 72.85 to 129.63 percent, and 186.4 percent for chassis from Mexico, Thailand, and Vietnam, respectively. Also on June 18, 2026, Commerce issued its countervailing duty orders with final

[4] Chassis and Subassemblies from China, Inv. Nos. 701-TA-657 (Final), USITC Publication 5187, May 2021 ("Original publication"), p. 1.1.
[5] 86 FR 56, January 4, 2021.
[6] 86 FR 15186, March 22, 2021.
[7] 86 FR 24665, May 7, 2021.
[8] 86 FR 24844, May 10, 2021.
[9] 86 FR 26694, May 17, 2021.
[10] 86 FR 36158, July 8, 2021.
[11] 86 FR 36093, July 8, 2021.

subsidy rates of 76.91 precent, and 9.65 to 10.72 percent, for Mexico and Thailand, respectively.[12]

Commerce's five-year reviews

Commerce announced that it would conduct expedited reviews with respect to the orders on imports of chassis from China with the intent of issuing the final results of these reviews based on the facts available not later than July 30, 2026.[13] Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at https://access.trade.gov/frnotices and subsequently on the Commission's Electronic Document Information System ("EDIS"). Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention,[14] as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping and/or countervailing duty orders on imports of chassis from China are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

The product

Commerce's scope

Commerce has defined the scope as follows:

> The merchandise covered by this order consists of chassis and subassemblies thereof, whether finished or unfinished, whether assembled or unassembled, whether coated or uncoated, regardless of the number of axles, for carriage of containers, or other payloads (including self-supporting payloads) for road, marine roll-on/roll-off (RORO) and/or rail transport. Chassis are typically, but are not limited to,

[12] 91 FR 36800 and 91 FR 36806, June 18, 2026.

[13] Letter from Eric Greynolds, Director, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, May 20, 2026.

[14] On April 27, 2026, and in response to a covered merchandise referral by U.S. Customs and Border Protection (CBP), Commerce determined that certain merchandise subject to the inquiry imported into in the United States by FEMC LLC, formerly known as AXN Heavy Duty LLC, is covered under the antidumping countervailing duty orders on chassis from China. 91 FR 22494, April 27, 2026.

rectangular framed trailers with a suspension and axle system, wheels and tires, brakes, a lighting and electrical system, a coupling for towing behind a truck tractor, and a locking system or systems to secure the shipping container or containers to the chassis using twistlocks, slide pins or similar attachment devices to engage the corner fittings on the container or other payload.

Subject merchandise includes, but is not limited to, the following subassemblies:

- Chassis frames, or sections of chassis frames, including kingpin assemblies, bolsters consisting of transverse beams with locking or support mechanisms, goosenecks, drop assemblies, extension mechanisms and/or rear impact guards;

- Running gear assemblies or axle assemblies for connection to the chassis frame, whether fixed in nature or capable of sliding fore and aft or lifting up and lowering down, which may or may not include suspension(s) (mechanical or pneumatic), wheel end components, slack adjusters, axles, brake chambers, locking pins, and tires and wheels;

- Landing gear assemblies, for connection to the chassis frame, capable of supporting the chassis when it is not engaged to a tractor; and

- Assemblies that connect to the chassis frame or a section of the chassis frame, such as, but not limited to, pintle hooks or B-trains (which include a fifth wheel), which are capable of connecting a chassis to a converter dolly or another chassis.

Importation of any of these subassemblies, whether assembled or unassembled, constitutes an unfinished chassis for purposes of this order.

Subject merchandise also includes chassis, whether finished or unfinished, entered with or for further assembly with components such

as, but not limited to: Hub and drum assemblies, brake assemblies (either drum or disc), axles, brake chambers, suspensions and suspension components, wheel end components, landing gear legs, spoke or disc wheels, tires, brake control systems, electrical harnesses and lighting systems.

Processing of finished and unfinished chassis and components such as trimming, cutting, grinding, notching, punching, drilling, painting, coating, staining, finishing, assembly, or any other processing either in the country of manufacture of the in-scope product or in a third country does not remove the product from the scope. Inclusion of other components not identified as comprising the finished or unfinished chassis does not remove the product from the scope.

Individual components entered and sold by themselves are not subject to the order, but components entered with or for further assembly with a finished or unfinished chassis are subject merchandise. A finished chassis is ultimately comprised of several different types of subassemblies. Within each subassembly there are numerous components that comprise a given subassembly.

This scope excludes dry van trailers, refrigerated van trailers and flatbed trailers. Dry van trailers are trailers with a wholly enclosed cargo space comprised of fixed sides, nose, floor and roof, with articulated panels (doors) across the rear and occasionally at selected places on the sides, with the cargo space being permanently incorporated in the trailer itself. Refrigerated van trailers are trailers with a wholly enclosed cargo space comprised of fixed sides, nose, floor and roof, with articulated panels (doors) across the rear and occasionally at selected places on the sides, with the cargo space being permanently incorporated in the trailer and being insulated, possessing specific thermal properties intended for use with self-contained refrigeration systems. Flatbed (or platform) trailers consist of load-carrying main frames and a solid, flat or stepped loading

deck or floor permanently incorporated with and supported by frame rails and cross members. [15]

U.S. tariff treatment

Chassis are currently imported under statistical reporting numbers 8716.39.0090 and 8716.90.5060 of the Harmonized Tariff Schedule of the United States ("HTS").[16] The general rate of duty is "free" for HTS subheading 8716.39.00 and 3.1 percent ad valorem for HTS subheading 8716.90.50. 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 chassis from China. Table 1.3 provides a summary of additional tariffs in place as of June 10, 2026. Historical information is summarized beneath the table.

[15] 86 FR 36093, July 8, 2021.

[16] Subject merchandise may also be imported under secondary statistical reporting number 8716.90.5010. USITC, HTS (2026) Revision 10, Publication 5753, June 2026, pp. 87.33 and 87.34.

Table 1.3 Chassis: Additional tariffs on imports originating in China as of June 10, 2026

Duty rates in percent ad valorem

Additional tariff	8716.39.0090	8716.90.5060
Section 232	25	25
Section 301	25	25
Section 122	NA	NA
Total additional ad valorem rate	50	50

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 below for historical changes to the additional tariffs.

Section 232 tariffs

Chassis originating in China are subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.[17]

[17] Effective August 18, 2025, chassis provided for under HTS subheading 8716.39.00 originating in China became subject to an additional 50 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. The duty did not apply if the derivative steel product was processed in another country from steel articles that were melted and poured in the United States. The duty applied to the declared value of the steel content of the product. Effective April 6, 2026, the section 232 duty for chassis provided for in subheadings 8716.39.00 originating in China was reduced to 25 percent and applied to the full customs value of the product.

In addition, effective April 6, 2026, chassis provided for in 8716.90.50 originating in China became subject to an additional 25 percent ad valorem duty under section 232. The duty is applied to the full customs value of the product. Before April 6, 2026, chassis provided for in HTS subheading 8716.90.50 were not subject to an additional ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.

90 FR 9817, February 18, 2025; 90 FR 40326, August 19, 2025; 91 FR 18201, April 9, 2026. See also HTS heading 9903.82.09 and U.S. note 16(c)(vii) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 10, Publication 5753, June 2026, pp. 99.3.67 to 99.3.69 and 99.3.423.

An importer of record, however, could declare medium- and heavy-duty vehicle parts ("MHDVPs") as subject to the section 232 tariffs on MHDVPs if they are not listed in the products subject to such tariffs. Therefore, if the importer did so for chassis, effective November 1, 2025, chassis would not have been subject to the 50 percent section 232 duty on derivative steel products but instead would be subject to the additional 25 percent ad valorem duty under section 232 on MHDVPs. HTS heading 9903.74.09 applies to parts of medium- and heavy-duty vehicles when certified by the importer of record that such parts will be used for medium- or heavy-duty vehicle production or repair activity in the United States. 90 FR 48451, October 17, 2025. See also HTS headings 9903.74.01 and 9903.74.09, and U.S. note 38(a)

(*continued*...)

Section 301 tariffs

Effective September 24, 2018, chassis provided for in HTS subheadings 8716.39.00 or 8716.90.50 originating in China were subject to an additional 10 percent ad valorem duty under section 301 of the Trade Act of 1974. Effective May 10, 2019, the section 301 duty for chassis increased to 25 percent.[18] Effective August 12, 2020, some exclusions have been granted for components that may be used in chassis.[19]

Section 122 tariffs

Chassis provided for under subheadings 8716.39.00 and 8716.90.50 originating from China are not subject to tariffs initiated under section 122 of the Trade Act of 1974.[20]

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and 38(j) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 10, Publication 5753, June 2026, pp. 99.3.362, 99.3.364, 99.3.418, and 99.3.419.

In addition, if chassis were declared as MHDVPs subject to the section 232 tariffs on MHDVPs, they would not have been subject to section 122 tariffs and from November 1, 2025, onward, chassis would not have been subject to the formerly in effect IEEPA tariffs. Products subject to section 232 tariffs are not subject to the tariffs initiated under section 122, the formerly in effect IEEPA tariffs, and several other tariffs not relevant to this investigation. 90 FR 48451, October 17, 2025. See also HTS headings 9903.01.33 and 9903.03.06 and U.S. note 38(a) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 10, Publication 5753, June 2026, pp. 99.3.362, 99.3.371, and 99.3.405.

[18] 83 FR 47974, September 21, 2018; 84 FR 20459, May 9, 2019. See also HTS headings 9903.88.03 and 9903.88.04 and U.S. notes 20(e), 20(f), and 20(g) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2026) Revision 10, Publication 5753, June 2026, pp. 99.3.96 to 99.3.121, 99.3.426, and 99.3.427. Goods exported from China to the United States prior to May 10, 2019, and entering the United States prior to June 1, 2019, were not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019).

[19] See U.S. note 20(f) to subchapter 3 of HTS chapter 99. USITC, HTS (2026) Revision 10, Publication 5753, June 2026, p. 99.3.97 to 99.3.120.

[20] 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 chassis, are not subject to the tariffs initiated under section 122. Effective February 24, 2026, chassis provided for under HTS subheadings 8716.39.00 and 8716.90.50 originating in China were subject to an additional 10 percent ad valorem duty under section 122 of the Trade Act of 1974. [20] For chassis provided for under subheading 8716.39.00, the Section 122 duty applied only to any non-steel content. Effective April 6, 2026, chassis provided for in HTS subheadings 8716.39.00 and 8716.90.50 originating in China were no longer subject to section 122 duties because section 232 tariffs applied to the full customs value of the products. 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 10, Publication 5753, June 2026, pp. 99.3.58 and 99.3.405.

Tariffs initiated under the International Emergency Economic Powers Act ("IEEPA")[21]

Effective February 20, 2026, all tariffs initiated under IEEPA were terminated. Below is a history of the IEEPA tariffs relevant to chassis originating in China that were in effect until February 20, 2026.

China-specific IEEPA tariffs

Effective February 4, 2025, chassis originating in China were 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. As noted previously, effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated. [22]

Tariffs initiated in April 2025 under IEEPA

Effective April 5, 2025, chassis provided for under HTS subheading 8716.90.50 originating in China were subject to an additional 10 percent ad valorem duty as part of tariffs initiated in April 2025 under IEEPA. That duty rose to 84 percent ad valorem effective April 9, 2025, and rose again to 125 percent effective April 10, 2025. However, effective May 14, 2025, the duty rate for tariffs initiated in April 2025 under IEEPA on products originating in China was reduced to 10 percent. For chassis provided for under HTS subheading 8716.39.00 originating in China, only the non-steel content in chassis was subject to the tariffs initiated in April 2025

[21] 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.

[22] 90 FR 9121, February 7, 2025; 90 FR 11426, March 6, 2025; 90 FR 11463, March 7, 2025; 90 FR 50725, November 7, 2025; 91 FR 9437, February 25, 2026. 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 10, Publication 5753, June 2026, pp. 99.3.3, 99.3.4, 99.3.368, and 99.3.369.

under IEEPA.[23] As noted previously, effective February 20, 2026, tariffs initiated under IEEPA and the associated duties imposed under IEEPA were terminated. [24]

Description and uses[25]

Chassis are skeletal rectangular-framed trailers used to transport shipping containers (figure 1.1). The rectangular frame is made of steel and consists of a suspension and axle system, wheels and tires, brakes, a lighting and electrical system, a coupling for towing behind a truck tractor, and a locking system to secure the shipping container or containers attached to the chassis. Chassis are designed to carry containers of various sizes, typically 20', 40', 45', or 53'. They can also be built to carry more than one size of container (referred to as "combos"). These extendable chassis that carry containers of multiple lengths feature a sliding or adjustable suspension (figure 1.2) or a protracting frame that elongates the chassis (figure 1.3). A large majority of chassis in the U.S. are 20' and 40', though in recent years there has been an increase in the demand of 53' chassis.[26]

[23] Articles subject to section 232 tariffs, including chassis provided for under subheading 8716.39.00, were not subject to the tariffs initiated in April 2025 under IEEPA. However, the non-steel content in chassis, if any, was 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 10, Publication 5753, June 2026, pp. 99.3.4, 99.3.369, and 99.3.371.

[24] For China, the duty as part of tariffs initiated in April 2025 under IEEPA was in addition to the 10 percent ad valorem duty under IEEPA that went into effect on November 10, 2025. 90 FR 15041, April 7, 2025; 90 FR 15509, April 14, 2025; 90 FR 15625, April 15, 2025; 90 FR 21831, May 21, 2025; 90 FR 39305, August 14, 2025; 90 FR 50729, November 7, 2025; 91 FR 9437, February 25, 2026. See also HTS headings 9903.01.25 and 9903.01.63 and U.S. note 2(v) to subchapter 3 of chapter 99 and related tariff provisions for this duty treatment. HTS (2026) Revision 10, Publication 5753, June 2026, pp. 99.3.4, 99.3.369, and 99.3.376.

[25] Unless otherwise noted, this information is based on Chassis and Subassemblies from China, Inv. No. 701-TA-657 (Final), USITC Publication 5187, May 2021 ("Original publication"), pp. 1.10 to 1.14.

[26] Chassis and Subassemblies from Mexico, Thailand, and Vietnam, Inv. Nos. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Publication 5742, June 2026, p. 1.15.

Figure 1.1 Standard chassis for 20’ containers



Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.11.

Figure 1.2 Extendable chassis for 20’ and 40’ containers with sliding suspension



Source: USITC, *Chassis and Subassemblies from Mexico, Thailand, and Vietnam*, June 2026 p. 1.16.

Figure 1.3 Extendable chassis for 20’ and 40’ containers with extending frame



Source: USITC, *Chassis and Subassemblies from Mexico, Thailand, and Vietnam*, June 2026, p. 1.16.

The subassemblies (chassis frames, running gear assemblies, and components that can be used to connect a chassis to another chassis) are also included in the scope. The chassis frame is only used in chassis production, while the other components (such as landing gear legs, axles, suspension, etc.) could be used in other types of trailers.

The “kingpin” is located at the front of the chassis and is used to connect the chassis to a road tractor. A few feet behind the kingpin is the “landing gear”, designed to support the front of the chassis when the kingpin is not attached to a road tractor. Containers are secured to the chassis using a twistlock in a corner casting (figures 1.4 and 1.5). The twistlock is inserted into the corner casting, then the end is twisted so it cannot be withdrawn again.

Figure 1.4 Corner casting (empty)



Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.12.

Figure 1.5 Twistlock that has been inserted into a corner casting



Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.12.

Chassis have an air-brake system, which uses compressed air to transmit pressure from the driver control to service brakes and emergency brakes. An interlocking hose coupling, or "glad hands" connector, connects air brake hoses from the chassis to the road tractor (figure 1.6). The system is tested in accordance with the Truck Trailer Manufacturer's Association Recommended Practice RP12. The brakes must comply with Federal Motor Vehicle Safety Standards (FMVSS) 121.

Figure 1.6 Glad hands hose assembly (10 ft)



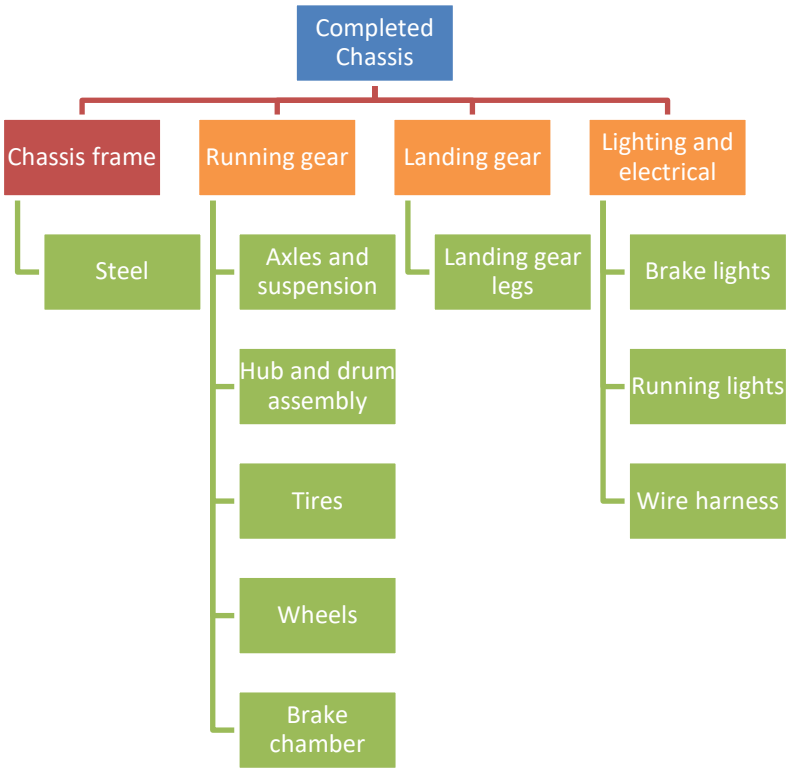
Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.13.

The rear of the chassis features an axle with wheels and tires, as well as brake lights, running lights, and a rear bumper. Chassis usually have eight to twelve wheels divided into two to three rows of "dualies" (where there are two wheels next to each other) on each side of the axle. The rear bumper must comply with FMVSS 223 and 224.

Manufacturing process[27]

The four major subassemblies for the chassis are the frame, the running gear assembly, landing gear, and lighting and electrical system (figure 1.7). The running gear, air brake system, and lighting and electrical system are made up of components that are produced by third parties, assembled into subassemblies, and installed on the chassis frame to produce a finished product. The running gear assembly is made up of tires, hub and drum assemblies, axles and suspensions, brake chambers, and other components.

Figure 1.7 Chassis, subassembly, and components



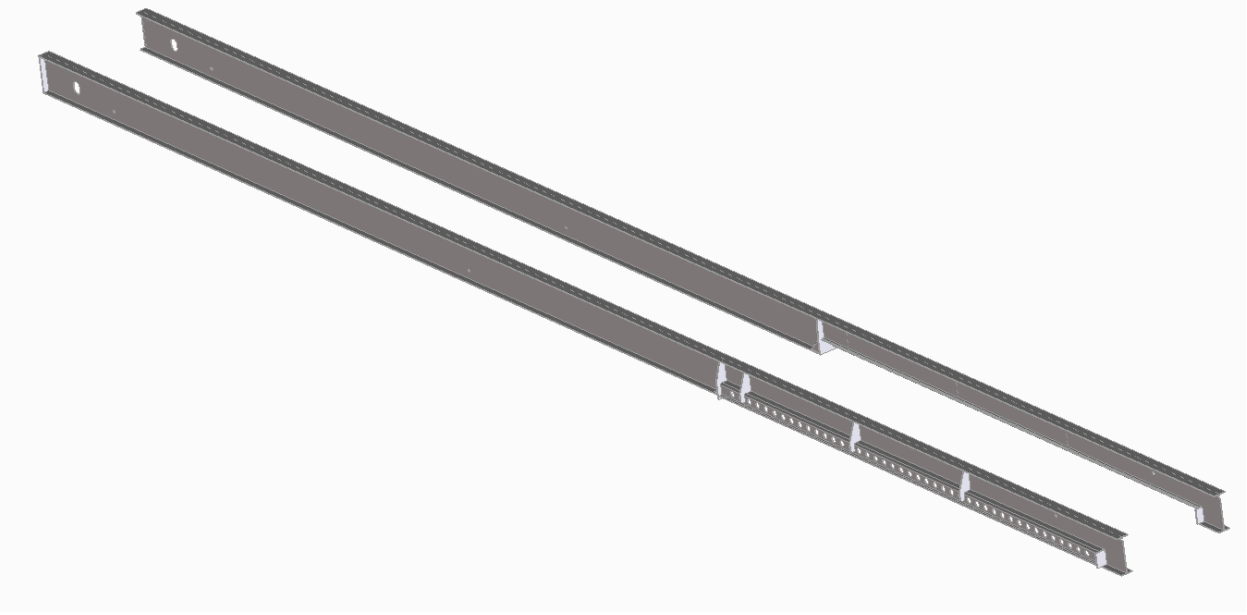
Source: USITC, *Chassis and Subassemblies from Mexico, Thailand, and Vietnam*, June 2026, p. 1.20.

[27] Unless otherwise noted, this information is based on original publication, pp. 1.14 to 1.21.

Note: Red items tend to be assembled at the chassis production plant using components, green items are produced by outside suppliers.

The chassis frame consists of welded steel parts in three basic segments: front, or forward beam and front crossmember assembly; middle assembly; and rear, or rear crossmember including the Rear Impact Guard assembly. Steel I-beams (the long external beams in figure 1.8), box beams (a hollow beam made up of four solid beams), channels (a beam in what appears to be a c-shape), and angles (beam that forms more of an L-shape) are cut and welded together in the shape of the frame (figures 1.8 and 1.9). The gooseneck is welded on next (figure 1.10). The primary form of welding in the industry is increasingly robotic welding, particularly when producing a standard chassis.[28]

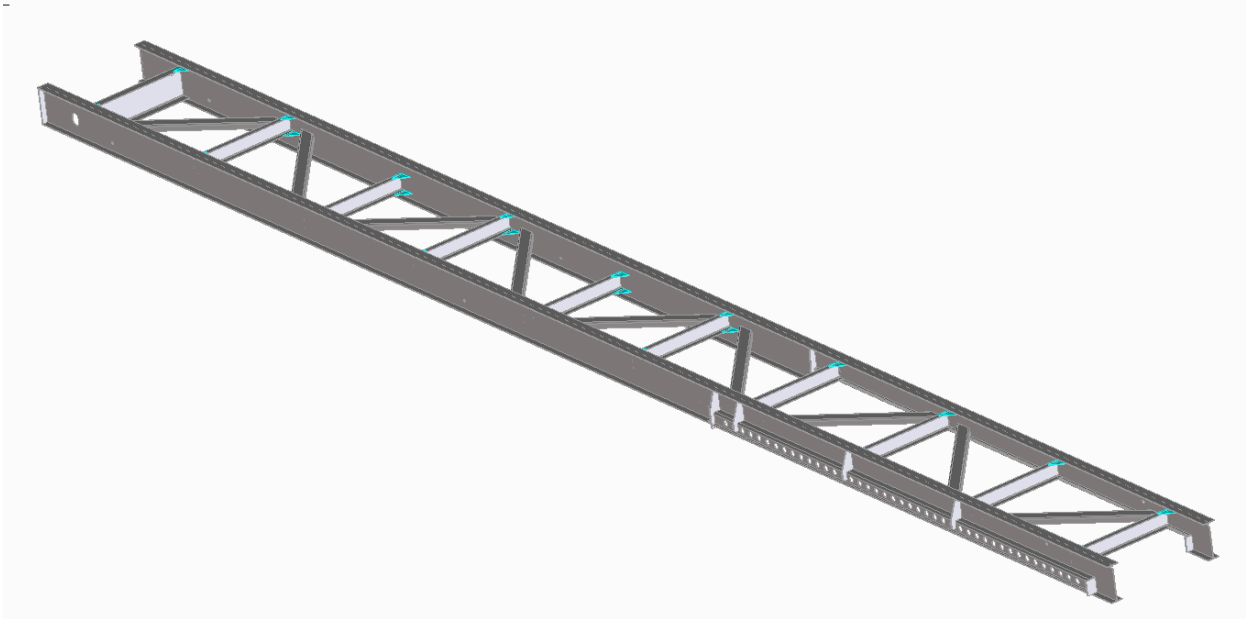
Figure 1.8 Chassis main frame subassembly with main beams



Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.15.

[28] In the original investigation, CIE indicated that it used robotic welding, while U.S. manufacturers indicated that they typically used manual welding. However, in a more recent investigation covering the same product, U.S. manufacturers indicated that they have begun using primarily robotic welding. Chassis and Subassemblies from Mexico, Thailand, and Vietnam, Inv. Nos. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Publication 5742, June 2026, p. 1.20.

Figure 1.9 Chassis main frame subassembly with crossmembers diagonals and slide rails



Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.16.

Figure 1.10 Gooseneck combined with main frame

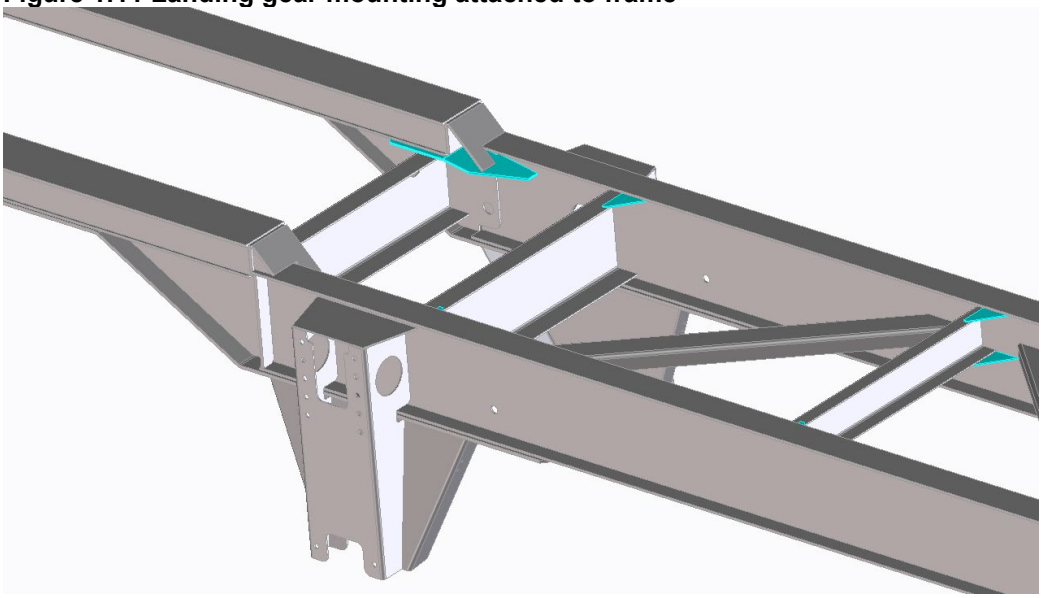


Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.16.

After the steel parts are welded together and coated, the air brake system and electrical components are added. Final assembly of the chassis is a seven-stage process:

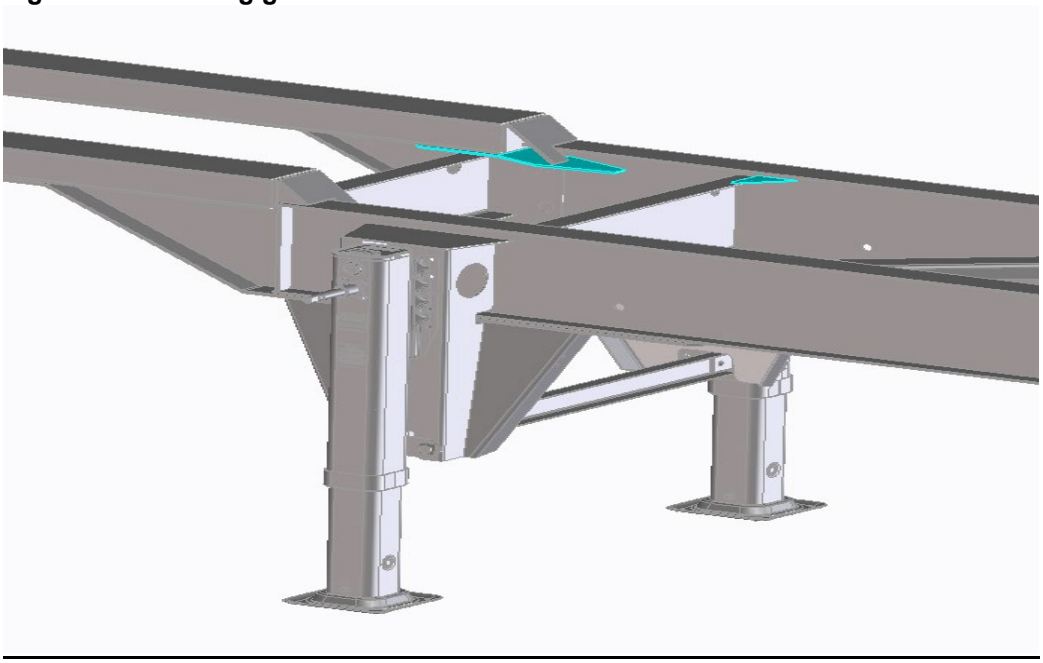
1. The front assembly is oriented with king pin (the part that attaches to a road tractor for towing) facing upward so the landing gear and cross-brace can be attached (figures 1.11 and 1.12).
2. The mainframe is inverted for the installation of the axle/wheel/tire portion of the suspension (i.e., running gear) (figure 1.13).
3. The front and mainframe are oriented in an upright position and the connection just behind the landing gear is completed.
4. The rear section, which can be made up of the rear bolster and the rear impact guard, is attached to the rear portion of the main beam behind the suspension (figures 1.14 and 1.15).
5. Axle alignment procedure is performed.
6. Air and electrical connections are completed from section to section using glad hands connectors for the air brakes and a plug and socket for the electrical connection.
7. The final inspection, including light check, air brake timing tests, and Federal Highway Administration ("FHWA") inspection is accomplished.

Figure 1.11 Landing gear mounting attached to frame



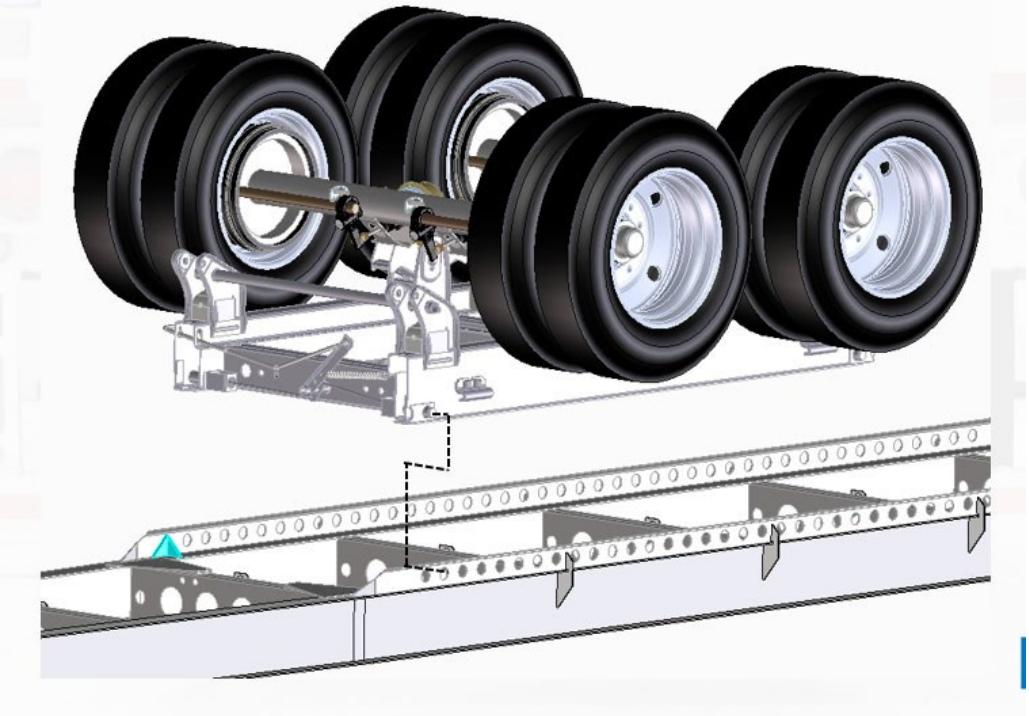
Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.17.

Figure 1.12 Landing gear and crossbrace installed



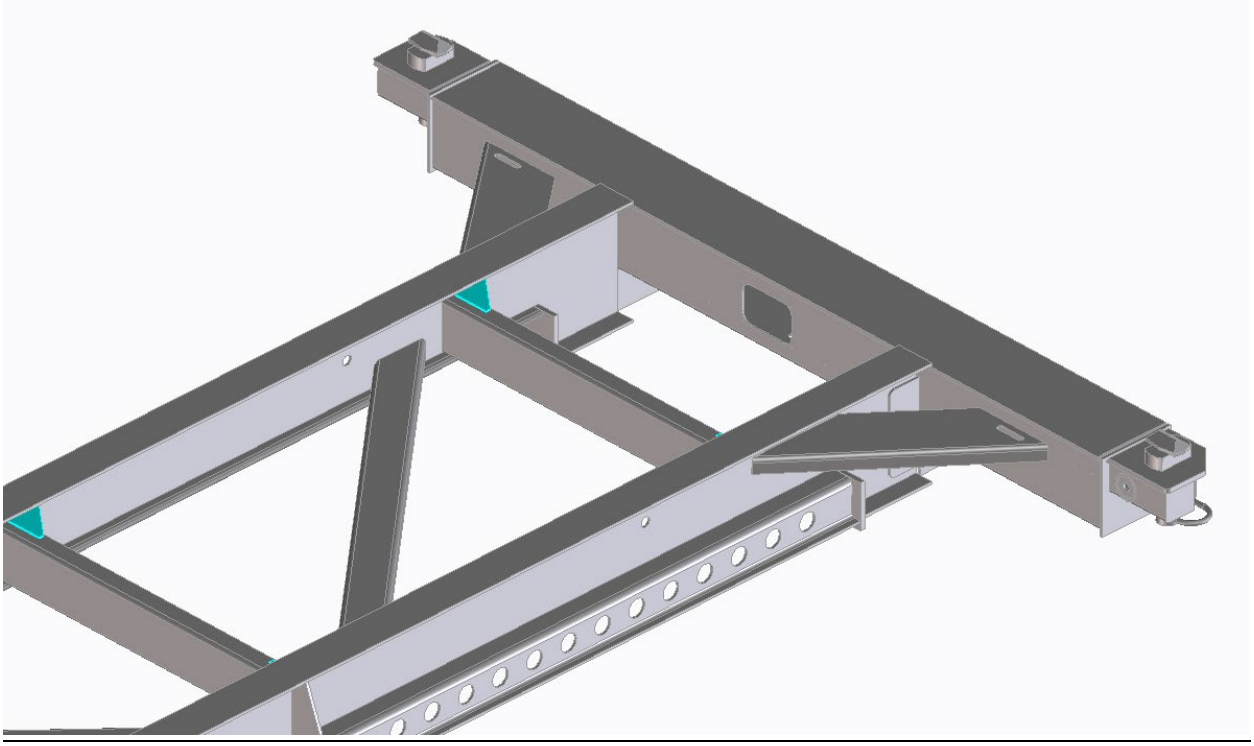
Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.18.

Figure 1.13 Running gear assembly



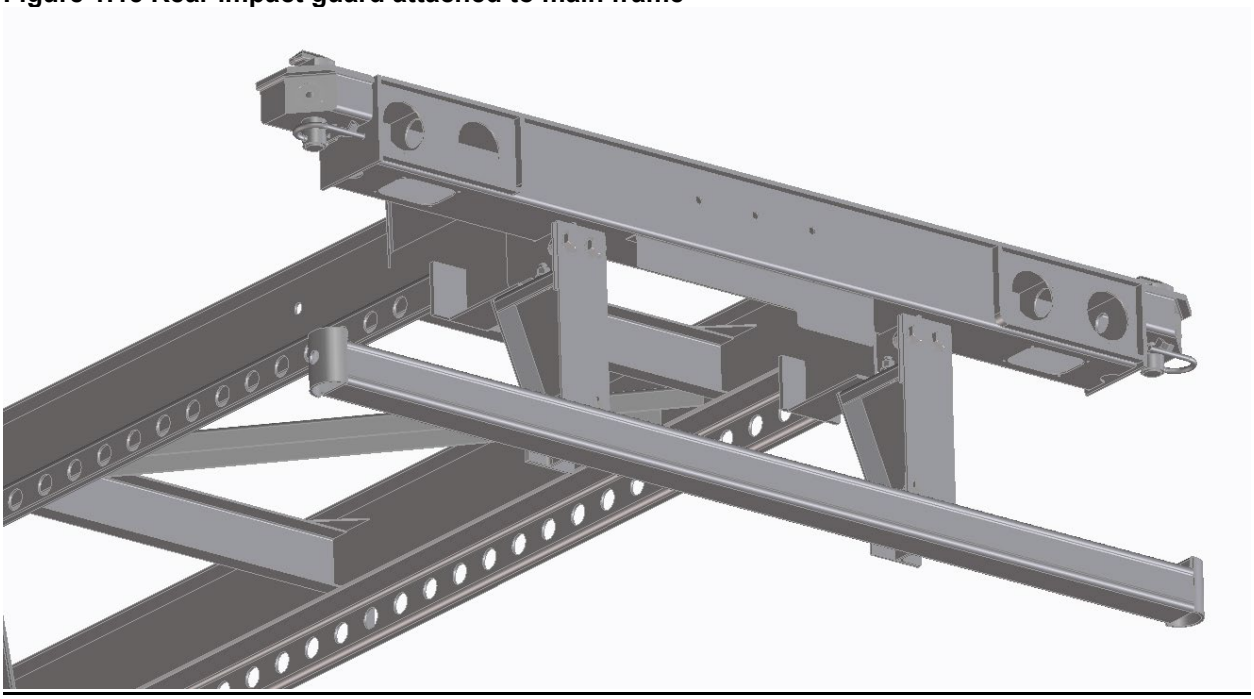
Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.20.

Figure 1.14 Rear bolster attached to main frame



Source: USITC, *Chassis and Subassemblies from China*, May 2021, p. 1.20.

Figure 1.15 Rear impact guard attached to main frame



Source: USITC, Chassis and Subassemblies from China, May 2021, p. 1.20.

The industry in the United States

U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from six firms, which accounted for more than 95 percent of production of chassis in the United States during 2020.[29]

In response to the Commission's notice of institution in these current reviews, domestic interested parties provided a list of six known and currently operating U.S. producers of chassis. In the recently completed antidumping and countervailing duty investigations concerning chassis from Mexico, Thailand, and Vietnam, the Commission identified eight U.S. producers of chassis, in addition to one firm (CIE Manufacturing) which assembles chassis subassemblies into finished chassis.[30] These eight integrated producers of chassis, inclusive of the two producers

[29] Original publication, p. 1.5.

[30] In both the original investigations covering chassis from China, as well as the recently completed investigations concerning chassis from Mexico, Thailand, and Vietnam, the assembly-only operations of CIE Manufacturing were not included in the domestic industry dataset. Chassis and Subassemblies from Mexico, Thailand, and Vietnam, Inv. Nos. 701-TA-755-756 and 731-TA-1734-1736 (Final), USITC Publication 5742, June 2026 ("Chassis from Mexico, Thailand, and Vietnam publication"), p. C.1

which comprise the Coalition of American Chassis Manufacturers, accounted for virtually all U.S. production of chassis in 2024. Two firms providing U.S. industry data in response to the Commission's notice of institution accounted for approximately *** percent of production of chassis in the United States during 2025.[31]

Recent developments

Table 1.4 presents events in the U.S. industry since the Commission's original investigation.[32]

Table 1.4 Chassis: Important industry events since 2021

Item	Firm	Event
Plant Opening	Stoughton	In January 2022 Stoughton announced that it would begin producing intermodal chassis at a new facility in Waco, Texas in Q2 of 2022.
Recall	Cheetah	On July 1, 2022, Cheetah Chassis issued a recall for 466 chassis because of concerns about twistlocks becoming loose.
Acquisition	Hercules	On November 3, 2022, it was announced that Hercules Chassis was acquired by Randon, a Latin American manufacturer.
Recall	Stoughton	On June 22, 2023, Stoughton issued a recall for 1,152 chassis for inadequate wheel nut torque after two separate wheel off reports.
Recall	Stoughton	On June 30, 2023, Stoughton issued a separate recall for 55 chassis with incorrect length brake hoses.
Recall	PIC Trailers	On November 3, 2023, Pratt Intermodal Chassis issued a recall for all chassis built between December 2021 and June 2022. These chassis have a potential for a structural failure between the front gooseneck and midrail.

[31] The domestic interested party also provided certain trade and financial information on behalf of U.S. producer ***. The total estimated share of U.S. production of chassis in 2025 accounted for by these three firms combined is *** percent. Domestic interested party's response to the notice of institution, May 1, 2026, p. exh. 1. Domestic interested party's supplemental response to the notice of institution, May 22, 2026, p. 1.

[32] For recent developments, if any, in tariff treatment, please see "U.S. tariff treatment" section.

Item	Firm	Event
New Production Line	Stoughton	In December 2021, Stoughton installed a new chassis production line at its Stoughton, Wisconsin facility.
Acquisition	Pratt Intermodal Chassis	On December 6, 2021, the North American Chassis Pool Cooperative acquired Pratt Industries Intermodal Chassis and renamed it “Pratt Intermodal Chassis LLC.”
Partnership Agreement	Stoughton	On November 25, 2025, Stoughton announced two new partners to their dealership network, TyCorra Fleet Solutions Inc. and Northstar Trailer. TyCorra serves customers in Ontario, Quebec and Atlantic Canada, while Northstar serves North Carolina and South Carolina.
Investigation Determination	U.S. Industry	On May 20, 2026, the U.S. International Trade Commission determined that the U.S. industry is materially injured by reason of imports of chassis and subassemblies from Mexico, Thailand, and Vietnam.
Antidumping and Countervailing Duty Orders	U.S. Industry	On June 18, 2026, as a result of the above affirmative determinations, the U.S. Department of Commerce issued countervailing duty orders on certain chassis and subassemblies from Mexico and Thailand. They also issued antidumping duty orders on chassis and subassemblies from Mexico, Thailand, and Vietnam.

Sources: Trailer Body Builders, “NACPC buys Pratt’s intermodal chassis production business,” December 7, 2021. https://www.trailer-bodybuilders.com/home/article/21183656/nacpc-buys-pratts-intermodal-chassis-production-business; Stoughton Trailers, “Stoughton Announces Expanded Intermodal Chassis Production in 2022,” January 3, 2022. https://www.stoughtontrailers.com/Portals/0/documents/Stoughton%20Expanded%20Chassis%20Production%20Press%20Release%20Jan%203%202022.pdf?ver=2022-01-03-165206-607; NHTSA, Part 573 Safety Recall Report 22V-518, July 1, 2022. https://static.nhtsa.gov/odi/rcl/2022/RCLRPT-22V518-4009.PDF; Heavy Duty Trucking, “Randon Acquires Hercules, Enters U.S. Trailer Market,” November 3, 2022. https://www.truckinginfo.com/news/randon-acquires-hercules-enters-u-s-trailer-market; NHTSA, Part 573 Safety Recall Report 23V-426, June 22, 2023. https://static.nhtsa.gov/odi/rcl/2023/RCLRPT-23V426-7820.PDF; NHTSA, Part 573 Safety Recall Report 23V-460, June 30, 2023. https://static.nhtsa.gov/odi/rcl/2023/RCLRPT-23V460-2913.PDF; NHTSA, Part 573 Safety Recall Report 23V-767, February 27, 2024. https://static.nhtsa.gov/odi/rcl/2023/RCLRPT-23V767-5890.PDF; Stoughton Trailers, “Stoughton Trailers Expands Dealer Network in Eastern Canada and Southeast U.S.” November 25, 2025. https://www.stoughtontrailers.com/news/id/255/stoughton-trailers-expands-dealer-network-in-eastern-canada-and-southeast-us; USITC, “Chassis and Subassemblies from Mexico, Thailand, and Vietnam Injure U.S. Industry,” May 20, 2026. https://www.usitc.gov/press_room/news_release/2026/er0520_68615.htm. Federal Register, “Certain Chassis and Subassemblies Thereof From Mexico and Thailand,” June 18, 2026. https://www.federalregister.gov/documents/2026/06/18/2026-12329/certain-chassis-and-subassemblies-thereof-from-mexico-and-thailand-countervailing-duty-orders; Federal Register, “Certain Chassis and Subassemblies Thereof From Mexico, Thailand, and the Socialist Republic of Vietnam,” June 18, 2026. https://www.federalregister.gov/documents/2026/06/18/2026-12330/certain-chassis-and-subassemblies-thereof-from-mexico-thailand-and-the-socialist-republic-of-vietnam.

U.S. producers' trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year reviews. Table 1.5 presents a compilation of the trade and financial data submitted from responding U.S. producers in the original investigations.

Table 1.5 Chassis: Trade and financial data submitted by U.S. producers, by period

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

Item	Measure	2018	2019	2020	2024	2025
Capacity	Quantity	***	***	***	64,247	***
Production	Quantity	***	***	***	8,153	***
Capacity utilization	Ratio	***	***	***	12.7	***
U.S. shipments	Quantity	***	***	***	8,199	***
U.S. shipments	Value	***	***	***	172,499	***
U.S. shipments	Unit value	***	***	***	$21,039	***
Net sales	Value	***	***	***	172,499	***
COGS	Value	***	***	***	166,065	***
COGS to net sales	Ratio	***	***	***	96.3	***
Gross profit or (loss)	Value	***	***	***	6,434	***
SG&A expenses	Value	***	***	***	18,764	***
Operating income or (loss)	Value	***	***	***	(12,330)	***
Operating income or (loss) to net sales	Ratio	***	***	***	(7.1)	***

Source: For the years 2018, 2019, and 2020, data are compiled using data submitted in the Commission's original investigations. For the year 2024, data are compiled using data submitted in the recently completed investigations concerning chassis from Mexico, Vietnam and Thailand. Chassis from Mexico, Thailand, and Vietnam publication, p. C.1. For the year 2025, data are compiled using data submitted by the domestic interested party. Domestic interested party's response to the notice of institution, May 1, 2026, exh. 1.

Note: For a discussion of data coverage, please see "U.S. producers" section. Data presented for 2024 are from the recently completed investigations covering chassis and subassemblies from Mexico, Thailand, and Vietnam, where U.S. producer questionnaire were submitted which accounted for virtually all U.S. production of chassis in 2024. U.S. producers' data for 2025 are compiled from the domestic interested party's response to the notice of institution, and account for *** percent of domestic production of chassis in 2025(inclusive of data provided by ***, in addition to the data provided by the domestic interested party).

Note: In the original investigations the Commission defined the domestic industry to encompass all domestic producers of chassis and subassemblies thereof, but not to include CIMC Intermodal

Equipment, LLC ("CIE"), as it found that CIE's subassembly operations during the POI of the original investigations were insufficient to constitute domestic production. Original publication, pp. 25 to 26. In the recently completed investigations concerning chassis from Mexico, Thailand, and Vietnam, the Commission continued to find that CIE's subassembly operations were insufficient to constitute domestic production.

Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if "appropriate circumstances" exist.[33]

In its original determinations, the Commission defined a single domestic like product coextensive with the scope of the investigations, consisting of all domestically produced chassis and subassemblies thereof. In its original determinations, the Commission defined the domestic industry as all domestic producers of chassis and subassemblies thereof, but not to include CIE's assembly operations.[34]

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from three firms, which were believed to account for nearly all imports of chassis from China during 2020.[35] Import data presented in the original investigations are based on questionnaire responses.[36]

Although the Commission did not receive responses from any respondent interested parties in these current reviews, in its response to the Commission's notice of institution, the domestic interested party listed CIE as the only potential U.S. importer of chassis from China.[37]

[33] Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).
[34] 91 FR 16223, April 1, 2025.
[35] Original publication, p. 4.1
[36] Original publication, p. 4.1
[37] Domestic interested party's response to the notice of institution, May 1, 2026, exh. 1.

U.S. imports

Table 1.6 presents the value of U.S. imports from China as well as the other top sources of U.S. imports (shown in descending order of 2025 imports by value). The imports data presented below cover imports under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060, which staff believe consist of a majority nonsubject merchandise. Furthermore, in the recent investigations concerning chassis from Mexico, Thailand, and Vietnam, which covered a period from January 2022 through September 2025, staff believed that imports of chassis from nonsubject sources (primarily Canada and China) were minimal during this period.[38]

Table 1.6 Chassis: U.S. imports, by source and period

Value in 1,000 dollars

U.S. imports from	Measure	2021	2022	2023	2024	2025
Mexico	Value	504,554	799,516	1,077,547	950,393	772,360
China	Value	550,800	614,596	476,014	433,601	407,901
Canada	Value	273,273	335,957	386,430	348,554	358,360
Taiwan	Value	15,522	21,096	12,560	9,821	68,128
Thailand	Value	11,888	41,119	86,626	27,208	22,041
Vietnam	Value	12,498	16,030	9,044	18,557	30,368
All other sources	Value	72,705	203,119	160,708	134,791	241,233
Nonsubject sources	Value	890,440	1,416,838	1,732,915	1,489,324	1,492,490
All import sources	Value	1,441,240	2,031,433	2,208,929	1,922,926	1,900,391

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060, accessed May 16, 2026. These data may be overstated as HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060 may contain products outside the scope of these reviews.

Note: Because of rounding, figure may not add to total shown. The unit of quantity for HTS statistical reporting number 8716.39.0090 (i.e., completed chassis) is units, while the HTS statistical reporting number for 8716.90.5060 (i.e., parts of subassemblies of chassis) is kilograms. As such, the imports data are presented in terms of value.

[38] Chassis from Mexico, Thailand, and Vietnam publication, p. 4.1. In those investigations, ***. Chassis and Subassemblies from Mexico, Thailand, and Vietnam (Final), Confidential Report, INV-YY-063, May 8, 2026 ("Chassis from Mexico, Thailand, and Vietnam confidential report") pp. 4.1 and 4.2

Apparent U.S. consumption and market shares

Table 1.7 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

Table 1.7 Chassis: Apparent U.S. consumption and market shares, by source and period

Value in 1,000 dollars; shares in percent

Source	Measure	2018	2019	2020	2024	2025
U.S. producers	Value	***	***	***	172,499	***
China	Value	***	***	***	—	407,901
Nonsubject sources	Value	***	***	***	—	1,492,490
All import sources	Value	***	***	***	99,219	1,900,391
Apparent U.S. consumption	Value	***	***	***	271,718	***
U.S. producers	Share of value	***	***	***	63.5	***
China	Share of value	***	***	***	—	***
Nonsubject sources	Share of value	***	***	***	—	***
All import sources	Share of value	***	***	***	36.5	***

Source: For the years 2018, 2019, and 2020, data are compiled using data submitted in the Commission's original investigations. For the year 2024, data presented are from the Chassis and Subassemblies from Mexico, Thailand, and Vietnam investigations. For the year 2025, U.S. producers' U.S. shipments are compiled from the domestic interested party's response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 8716.39.0090 and 8716.90.5060, accessed May 16, 2026.

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

Note: For 2018, 2019, and 2020, apparent U.S. consumption is derived from U.S. shipments of imports, rather than U.S. imports. The unit of quantity for HTS statistical reporting number 8716.39.0090 (i.e., completed chassis) is units, while the HTS statistical reporting number for 8716.90.5060 (i.e., parts of subassemblies of chassis) is kilograms. As such, the imports data are presented in terms of value.

Note: For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections. Data presented for 2024 are from the recently completed investigations covering chassis and subassemblies from Mexico, Thailand, and Vietnam, where U.S. producer questionnaire were submitted which accounted for virtually all U.S. production of chassis in 2024, and U.S. imports are compiled from data in response to Commission questionnaires. Due to the different countries subject to these reviews and those investigations, imports from China and nonsubject sources (as defined in these reviews) were not presented in the investigations covering Mexico, Thailand, and Vietnam. While U.S. producers' data in 2024 account for virtually all domestic production of chassis in 2024, U.S. producers' data for 2025 are compiled from the domestic interested party's response to the notice of institution, and account for *** percent of domestic production of chassis in 2025.

The industry in China

Producers in China

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from eight firms, which accounted for approximately *** percent of production of chassis in China during 2020, and approximately *** percent of chassis exports from China to the United States during 2020.[39]

Although the Commission did not receive responses from any respondent interested parties in these five-year reviews, the domestic interested party provided a list of four possible producers of chassis in China.[40]

Recent developments

Table 1.8 presents events in the Chinese industry since the Commission's original investigations.

Table 1.8 Chassis: Important industry events in the Chinese industry since 2021

Item	Firm	Event
Sanctions	CIE	In January 2025, CIE was added the U.S. Department of Defense's sanctions list for alleged links to the Chinese military.

Source: Lloyd's List, "Cosco and CIMC put of US Defense Department sanctions list," January 7, 2025. https://www.lloydslist.com/LL1152134/Cosco-and-CIMC-put-on-US-Defense-Department-sanctions-list

Exports

Table 1.9 presents export data for HS subheadings 8716.39 and 8716.90, categories that include chassis and parts, as well as out-of-scope products, from China (by export destination in descending order of value for 2025). These data may be overstated as HS subheadings 8716.39 and 8616.90 may contain products outside the scope of this review.

[39] Chassis and Subassemblies from China (Final), Confidential Report, INV-TT-051, April 2, 2021, as revised in INV-TT-056, April 12, 2021, and supplemented in INV-TT-077, June 11, 2021 ("Original confidential report"), p. 7.3.

[40] Domestic interested party's response to the notice of institution, May 1, 2026, p. exh. 1.

Table 1.9 Trailers and semi-trailers for the transport of goods, and parts thereof: Value of exports from China, by destination and period

Value in 1,000 dollars

Destination market	2020	2021	2022	2023	2024	2025
United States	536,880	634,254	712,411	596,418	519,978	415,473
Vietnam	75,717	180,194	144,687	112,973	180,310	276,931
Australia	114,264	207,023	230,365	252,291	227,702	222,169
Russia	73,498	87,338	91,496	148,716	271,435	191,017
Germany	101,729	164,261	149,910	129,190	148,414	170,071
Tanzania	17,758	32,054	66,873	113,525	82,098	141,238
Saudi Arabia	21,369	13,843	16,454	36,452	102,558	114,380
Guinea	7,121	10,577	13,239	14,372	34,001	111,567
Nigeria	32,875	61,651	49,126	42,569	47,631	88,099
Netherlands	72,398	88,817	87,549	72,587	82,785	87,812
All other markets	894,349	1,346,942	1,468,867	1,482,761	1,551,413	1,753,105
All markets	1,947,958	2,826,953	3,030,975	3,001,855	3,248,327	3,571,861

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 8716.39 and 8716.90, accessed May 26, 2026. These data may be overstated as HS subheading 8716.39 and 8716.90 may contain products outside the scope of this review.

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

Third-country trade actions

On February 18, 2022, Canada applied antidumping and countervailing duties on container chassis, container chassis frames, and certain subassemblies of container chassis originating in or exported from China.[41] On November 25, 2024, Canada launched an investigation into container chassis imported from Vietnam. THACO was being investigated for alleged circumvention of dumping and subsidizing rules, specifically by exporting chassis to Canada that were largely manufactured and assembled in China.[42] On April 10, 2025, Canadian regulators found that THACO's manufacturing does not use a major portion of parts or components from China, and there is significant transformation of the final chassis made in Vietnam. Therefore, it was determined that chassis imported from Vietnam did not circumvent China duties.[43]

[41] Government of Canada, "Container chassis: Measures in force," October, 18, 2024. https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cc-eng.html.

[42] Transport Topics, "Canada Investigates Vietnamese Container Chassis Imports," December 5, 2024. https://www.ttnews.com/articles/canada-vietnam-chassis-china.

[43] S&P Journal of Commerce, "Canadian regulators find Vietnamese chassis didn't circumvent China duties," April 10, 2025. https://www.joc.com/article/canadian-regulators-find-vietnamese-chassis-didnt-circumvent-china-duties-5981015.

The global market

Table 1.10 presents global export data for HS subheadings 8716.39 and 8716.90, categories that include chassis and parts, as well as out-of-scope products (by source in descending order of value for 2025). These data may be overstated as HS subheadings 8716.39 and 8616.90 may contain products outside the scope of this review.

Table 1.10 Trailers and semi-trailers for the transport of goods, and parts thereof: Value of global exports by country and period

Value in 1,000 dollars

Exporting country	2020	2021	2022	2023	2024	2025
Germany	4,119,947	5,803,250	5,689,505	6,070,738	4,796,165	5,342,330
China	1,947,958	2,826,953	3,030,975	3,001,855	3,248,327	3,571,861
United States	1,667,754	2,303,118	3,175,477	3,530,781	2,570,812	2,320,209
Mexico	660,785	909,730	2,962,674	3,822,940	2,662,865	2,205,049
Netherlands	813,507	972,948	1,258,133	1,288,451	1,248,629	1,346,447
Poland	707,270	1,064,447	1,193,316	1,397,659	1,208,000	1,163,259
Hungary	498,598	641,431	698,077	728,434	612,520	633,250
France	342,263	530,744	563,817	627,018	575,784	601,375
Canada	287,830	394,513	500,474	573,009	546,839	562,106
Turkey	329,857	532,251	651,244	743,176	580,113	499,790
Vietnam	36,579	64,458	71,815	76,909	45,417	100,905
Thailand	12,863	31,015	129,643	69,591	29,442	25,140
All other exporters	3,799,993	5,070,928	5,116,597	5,332,484	5,018,889	5,020,181
All exporters	15,225,203	21,145,786	25,041,748	27,263,045	23,143,804	23,391,901

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 8716.39 and 8716.90, accessed May 26, 2026. These data may be overstated as HS subheading 8716.39 and 8716.90 may contain products outside the scope of this review.

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

APPENDIX A

FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
91 FR 16223 April 1, 2026	*Chassis and Subassemblies From China; Institution of Five-Year Reviews*	https://www.govinfo.gov/content/pkg/FR-2026-04-01/pdf/2026-06292.pdf
91 FR 16181 April 1, 2026	*Initiation of Five-Year (Sunset) Reviews*	https://www.govinfo.gov/content/pkg/FR-2026-04-01/pdf/2026-06326.pdf

APPENDIX B

RESPONSES TO THE NOTICE OF INSTITUTION

Responses to the Commission's notice of institution

Individual responses

The Commission received one submission in response to its notice of institution in the subject reviews, filed on behalf of the Coalition of American Chassis Manufacturers, a trade coalition all of whose members manufacture, produce or wholesale chassis (collectively referred to herein as "domestic interested party").[1] [2]

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

Table B.1 Chassis: Summary of responses to the Commission's notice of institution

Interested party type	Number	Coverage
U.S. trade coalition	2	***%

Note: The U.S. trade coalition coverage figure presented is the domestic interested party's estimate of its share of total U.S. production of chassis during 2025. Domestic interested party's supplemental response to the notice of institution, May 22, 2026, p. 1.

Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct expedited or full reviews from the domestic interested party. The domestic interested party requests that the Commission conduct expedited reviews of the antidumping and countervailing duty orders on chassis.[3]

[1] The Coalition of American Chassis Manufacturers consists of two individual members, both of which are domestic producers of chassis. For a list of members, see the Domestic interested party's response to the notice of institution, May 1, 2026, p. 3.

[2] The domestic interested party also provided certain trade and financial information on behalf of U.S. producer ***. The total estimated share of U.S. production of chassis in 2025 accounted for by these three firms combined is *** percent. Domestic interested party's supplemental response to the notice of institution, May 22, 2026, p. 1.

[3] Domestic interested party's comments on adequacy, June 9, 2026.

Company-specific information

Table B.2 Chassis: Response checklist for U.S. producers

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

Item	Coalition of American Chassis Manufacturers
Nature of operation	Yes
Statement of intent to participate	Yes
Statement of likely effects of revoking the order	Yes
U.S. producer list	Yes
U.S. importer/foreign producer list	Yes
List of 3-5 leading purchasers	Yes
List of sources for national/regional prices	NA
Trade/financial data	Yes
Changes in supply/demand	Yes
Complete response	Yes

APPENDIX C

SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS

Related party exclusion

Table C-2

Chassis: Summary data concerning the U.S. market, excluding one U.S. producer *, 2018-20**

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. consumption quantity in units:						
Amount	***	***	***	▼***	▼***	▲***
Producers' share (fn1)						
Included producers	***	***	***	▼***	▲***	▼***
Excluded producers	***	***	***	▲***	▲***	▲***
All producers	***	***	***	▼***	▲***	▼***
Importers' share (fn1):						
China	***	***	***	▼***	▼***	▲***
Nonsubject sources	***	***	***	▲***	▼***	▲***
All import sources	***	***	***	▲***	▼***	▲***
U.S. consumption quantity in short tons:						
Amount	***	***	***	▼***	▼***	▼***
Producers' share (fn1)						
Included producers	***	***	***	▲***	▲***	▼***
Excluded producers	***	***	***	▲***	▲***	▲***
All producers	***	***	***	▲***	▲***	▼***
Importers' share (fn1):						
China	***	***	***	▼***	▼***	▼***
Nonsubject sources	***	***	***	▼***	▼***	▲***
All import sources	***	***	***	▼***	▼***	▲***
U.S. consumption value:						
Amount	***	***	***	▼***	▼***	▼***
Producers' share (fn1)						
Included producers	***	***	***	▲***	▲***	▼***
Excluded producers	***	***	***	▲***	▲***	▲***
All producers	***	***	***	▲***	▲***	▼***
Importers' share (fn1):						
China	***	***	***	▼***	▼***	▲***
Nonsubject sources	***	***	***	▼***	▼***	▲***
All import sources	***	***	***	▼***	▼***	▲***
U.S. importers' U.S. shipments of imports from:						
China:						
Quantity in units	***	***	***	▼***	▼***	▲***
Quantity in short tons	***	***	***	▼***	▼***	▼***
Value	***	***	***	▼***	▼***	▲***
Unit value based on units	***	***	***	▼***	▲***	▼***
Unit value based on short tons	***	***	***	▲***	▲***	▲***
Ending inventory in units	***	***	***	▼***	▼***	▼***
Nonsubject sources:						
Quantity in units	***	***	***	▼***	▼***	▲***
Quantity in short tons	***	***	***	▼***	▼***	▲***
Value	***	***	***	▼***	▼***	▲***
Unit value based on units	***	***	***	▼***	▲***	▼***
Unit value based on short tons	***	***	***	▲***	▲***	▼***
Ending inventory in units	***	***	***	***	***	***

Table continued on next page.

Table C-2--Continued
Chassis: Summary data concerning the U.S. market, excluding one U.S. producer *, 2018-20**

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
U.S. importers' U.S. shipments of imports from:--Continued						
All import sources:						
Quantity in units	***	***	***	▼***	▼***	▲***
Quantity in short tons	***	***	***	▼***	▼***	▼***
Value	***	***	***	▼***	▼***	▲***
Unit value based on units	***	***	***	▼***	▲***	▼***
Unit value based on short tons	***	***	***	▲***	▲***	▲***
Ending inventory in units	***	***	***	▼***	▼***	▼***
Included U.S. producers':						
Average capacity quantity	***	***	***	▲***	▲***	***
Production quantity	***	***	***	▼***	▼***	▼***
Capacity utilization (fn1)	***	***	***	▼***	▼***	▼***
U.S. shipments:						
Quantity in units	***	***	***	▼***	▼***	▼***
Quantity in short tons	***	***	***	▼***	▼***	▼***
Value	***	***	***	▼***	▼***	▼***
Unit value based on units	***	***	***	▼***	▲***	▼***
Unit value based on short tons	***	***	***	▼***	▲***	▼***
Export shipments:						
Quantity in units	***	***	***	▼***	▼***	▼***
Value	***	***	***	▼***	▼***	▼***
Unit value based on units	***	***	***	▲***	▲***	▲***
Ending inventory in units	***	***	***	▼***	▲***	▼***
Inventories/total shipments (fn1)	***	***	***	▲***	▲***	▼***
Production workers	***	***	***	▼***	▼***	▼***
Hours worked (1,000s)	***	***	***	▼***	▼***	▼***
Wages paid ($1,000)	***	***	***	▼***	▼***	▼***
Hourly wages (dollars per hour)	***	***	***	▲***	▲***	▲***
Productivity (units per 1,000 hours)	***	***	***	▼***	▼***	▼***
Unit labor costs	***	***	***	▲***	▲***	▲***

Table continued on next page.

Table C-2--Continued
Chassis: Summary data concerning the U.S. market, excluding one U.S. producer *, 2018-20**

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2018	2019	2020	2018-20	2018-19	2019-20
Included U.S. producers':--Continued						
Net sales:						
Quantity in units	***	***	***	▼***	▼***	▼***
Value	***	***	***	▼***	▼***	▼***
Unit value based on units	***	***	***	▼***	▲***	▼***
Cost of goods sold (COGS)	***	***	***	▼***	▼***	▼***
Gross profit or (loss) (fn2)	***	***	***	▼***	▼***	▼***
SG&A expenses	***	***	***	▼***	▲***	▼***
Operating income or (loss) (fn2)	***	***	***	▼***	▼***	▼***
Net income or (loss) (fn2)	***	***	***	▼***	▼***	▼***
Capital expenditures	***	***	***	▼***	▼***	▼***
Research and development expenses	***	***	***	▼***	▼***	▼***
Net assets	***	***	***	▼***	▼***	▼***
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)	***	***	***	▼***	▼***	▼***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

U.S. producers

Table C.1

Chassis: Summary data concerning the U.S. market defining the domestic industry as U.S. producers only, by item and period

Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Productivity=units per 1,000 hours; Period changes=percent--exceptions noted; Interim period is January through September

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. consumption quantity:									
Amount	79,126	63,343	16,214	11,767	11,541	▼(79.5)	▼(19.9)	▼(74.4)	▼(1.9)
Producers' share (fn1)	36.3	51.0	50.6	52.0	58.9	▲14.3	▲14.7	▼(0.4)	▲6.9
Importers' share (fn1):									
Mexico	***	***	***	***	***	▼***	▲***	▼***	▼***
Thailand	***	***	***	***	***	▼***	▼***	▲***	▼***
Vietnam	***	***	***	***	***	▼***	▼***	▲***	▲***
Subject sources	***	***	***	***	***	▼***	▼***	▲***	▼***
Nonsubject sources	***	***	***	***	***	▼***	▲***	▼***	▲***
All import sources	63.7	49.0	49.4	48.0	41.1	▼(14.3)	▼(14.7)	▲0.4	▼(6.9)
U.S. consumption value:									
Amount	1,058,679	1,057,189	271,718	212,253	182,291	▼(74.3)	▼(0.1)	▼(74.3)	▼(14.1)
Producers' share (fn1)	49.2	64.2	63.5	63.6	70.3	▲14.3	▲15.0	▼(0.7)	▲6.7
Importers' share (fn1):									
Mexico	***	***	***	***	***	▼***	▼***	▼***	▼***
Thailand	***	***	***	***	***	▼***	▼***	▲***	▼***
Vietnam	***	***	***	***	***	▼***	▼***	▲***	▲***
Subject sources	***	***	***	***	***	▼***	▼***	▲***	▼***
Nonsubject sources	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources	50.8	35.8	36.5	36.4	29.7	▼(14.3)	▼(15.0)	▲0.7	▼(6.7)
U.S. importers' U.S. shipments of imports from:									
Mexico:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Thailand:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▲***	▲***
Vietnam:									
Quantity	***	***	***	***	***	▼***	▼***	▲***	▲***
Value	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	▲***	***	▲***	▲***
Subject sources:									
Quantity	***	***	***	***	***	▼***	▼***	▼***	▼***
Value	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***
Nonsubject sources:									
Quantity	***	***	***	***	***	▼***	▲***	▼***	▲***
Value	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity	50,408	31,055	8,015	5,643	4,739	▼(84.1)	▼(38.4)	▼(74.2)	▼(16.0)
Value	537,846	378,477	99,219	77,327	54,168	▼(81.6)	▼(29.6)	▼(73.8)	▼(29.9)
Unit value	$10,670	$12,187	$12,379	$13,703	$11,430	▲16.0	▲14.2	▲1.6	▼(16.6)
Ending inventory quantity	***	***	***	***	***	▼***	▼***	▼***	▲***

Table continued.

Table C.1 Continued
Chassis: Summary data concerning the U.S. market defining the domestic industry as U.S. producers only, by item and period
Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Productivity=units per 1,000 hours; Period changes=percent--exceptions noted; Interim period is January through September

	Reported data					Period change comparisons			
	Calendar year			Interim		Calendar year			Interim
Item	2022	2023	2024	2024	2025	2022–24	2022–23	2023–24	2024–25
U.S. producers':									
Practical capacity quantity	66,416	79,277	64,247	48,906	47,650	▼(3.3)	▲19.4	▼(19.0)	▼(2.6)
Production quantity	28,671	34,448	8,153	6,198	6,869	▼(71.6)	▲20.1	▼(76.3)	▲10.8
Capacity utilization (fn1)	43.2	43.5	12.7	12.7	14.4	▼(30.5)	▲0.3	▼(30.8)	▲1.7
U.S. shipments:									
Quantity	28,718	32,288	8,199	6,124	6,802	▼(71.4)	▲12.4	▼(74.6)	▲11.1
Value	520,833	678,712	172,499	134,926	128,123	▼(66.9)	▲30.3	▼(74.6)	▼(5.0)
Unit value	$18,136	$21,021	$21,039	$22,032	$18,836	▲16.0	▲15.9	▲0.1	▼(14.5)
Export shipments:									
Quantity	***	***	***	***	***	▲***	***	▲***	▲***
Value	***	***	***	***	***	▲***	***	▲***	▲***
Unit value	***	***	***	***	***	▲***	***	▲***	▼***
Ending inventory quantity	***	***	***	***	***	▲***	▲***	▼***	▼***
Inventories/total shipments (fn1)	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers	988	1,312	660	657	525	▼(33.2)	▲32.8	▼(49.7)	▼(20.1)
Hours worked (1,000s)	2,216	2,690	1,193	972	742	▼(46.2)	▲21.4	▼(55.7)	▼(23.7)
Wages paid ($1,000)	47,532	63,977	32,709	26,407	20,111	▼(31.2)	▲34.6	▼(48.9)	▼(23.8)
Hourly wages (dollars per hour)	$21.45	$23.78	$27.42	$27.17	$27.10	▲27.8	▲10.9	▲15.3	▼(0.2)
Productivity (units per 1,000 hours)	12.9	12.8	6.8	6.4	9.3	▼(47.2)	▼(1.0)	▼(46.6)	▲45.2
Unit labor costs	$1,658	$1,857	$4,012	$4,261	$2,928	▲142.0	▲12.0	▲116.0	▼(31.3)
Net sales:									
Quantity	28,718	32,288	8,199	6,125	6,804	▼(71.4)	▲12.4	▼(74.6)	▲11.1
Value	520,833	678,712	172,499	134,945	128,155	▼(66.9)	▲30.3	▼(74.6)	▼(5.0)
Unit value	$18,136	$21,021	$21,039	$22,032	$18,835	▲16.0	▲15.9	▲0.1	▼(14.5)
Cost of goods sold (COGS)	479,407	586,511	166,065	129,679	127,561	▼(65.4)	▲22.3	▼(71.7)	▼(1.6)
Gross profit or (loss) (fn2)	41,426	92,201	6,434	5,266	594	▼(84.5)	▲122.6	▼(93.0)	▼(88.7)
SG&A expenses	27,960	37,874	18,764	12,154	10,816	▼(32.9)	▲35.5	▼(50.5)	▼(11.0)
Operating income or (loss) (fn2)	13,466	54,327	(12,330)	(6,888)	(10,222)	▼***	▲303.4	▼***	▼***
Net income or (loss) (fn2)	6,164	44,486	(16,305)	(6,767)	(10,334)	▼***	▲621.7	▼***	▼***
Unit COGS	$16,694	$18,165	$20,254	$21,172	$18,748	▲21.3	▲8.8	▲11.5	▼(11.4)
Unit SG&A expenses	$974	$1,173	$2,289	$1,984	$1,590	▲135.1	▲20.5	▲95.1	▼(19.9)
Unit operating income or (loss) (fn2)	$469	$1,683	$(1,504)	$(1,125)	$(1,502)	▼***	▲258.8	▼***	▼***
Unit net income or (loss) (fn2)	$215	$1,378	$(1,989)	$(1,105)	$(1,519)	▼***	▲541.9	▼***	▼***
COGS/sales (fn1)	92.0	86.4	96.3	96.1	99.5	▲4.2	▼(5.6)	▲9.9	▲3.4
Operating income or (loss)/sales (fn1)	2.6	8.0	(7.1)	(5.1)	(8.0)	▼(9.7)	▲5.4	▼(15.2)	▼(2.9)
Net income or (loss)/sales (fn1)	1.2	6.6	(9.5)	(5.0)	(8.1)	▼(10.6)	▲5.4	▼(16.0)	▼(3.0)
Capital expenditures	15,905	14,004	6,755	4,485	1,654	▼***	▼***	▼***	▼***
Research and development expenses	116	307	133	150	461	▲***	▲***	▼***	▲***
Total assets	197,014	180,214	163,054	NA	NA	▼(17.2)	▼(8.5)	▼(9.5)	NA

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 of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.
fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

APPENDIX D

PURCHASER QUESTIONNAIRE RESPONSES

As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties, and it identified these five firms that it believes to be the top five purchasers of chassis ***.[1] Purchaser questionnaires were sent to these five firms and two firms (***) provided responses, which are presented below.

[1] ***. Original publication, p. 3.2

1. Have there been any significant changes in the supply and demand conditions for chassis that have occurred in the United States or in the market for chassis in China since January 1, 2020?

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

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

Purchaser	Yes / No	Anticipated changes
***	***	***
***	***	***