

UNITED STATES INTERNATIONAL TRADE COMMISSION

BIRCH THREE-PLY DOOR SKINS
FROM JAPAN

Determination of Injury
in Investigation No. AA1921-150 Under the
Antidumping Act, 1921, as Amended



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UNITED STATES INTERNATIONAL TRADE COMMISSION

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[AA1921-150]

January 12, 1976

BIRCH THREE-PLY DOOR SKINS FROM JAPAN

Determination of Injury

On October 10, 1975, the United States International Trade Commission received advice from the Department of the Treasury that birch three-ply door skins from Japan are being, or are likely to be, sold in the United States at less than fair value within the meaning of the Antidumping Act, 1921, as amended (19 U.S.C. 160(a)). Accordingly, on October 22, 1975, the Commission instituted investigation No. AA1921-150 under section 201(a) of said act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such birch three-ply door skins into the United States.

Notice of the institution of the investigation and of the public hearing to be held in connection therewith was published in the Federal Register (40 F.R. 50575). The hearing was held on November 13, 1975.

In arriving at its determination, the Commission gave due consideration to written submissions from interested parties, evidence adduced at the hearing, and all factual information obtained by the Commission's staff from questionnaires, personal interviews, and other sources.

The United States International Trade Commission has determined by a vote of 4 to 2 (Commissioners Parker and Ablondi dissenting) that an industry in the United States is being injured 1/ by reason of the importation of birch three-ply door skins from Japan that are being, or are likely to be, sold at less than fair value within the meaning of the Antidumping Act, 1921, as amended.

1/ Commissioners Moore and Bedell have also determined that an industry is likely to be injured.

Statement of Reasons for Affirmative Determination
of Commissioners Moore and Bedell

On the basis of the reasons cited below, we have determined that an industry in the United States is being or is likely to be injured by reason of the importation of birch three-ply door skins from Japan which the Department of the Treasury found are being, or are likely to be, sold at less than fair value (LTFV).

The LTFV determination by the Department of the Treasury is based upon an examination of some four-fifths of Japanese exports of birch three-ply door skins to the United States during the 7-month period August 1974 through February 1975. It found that 82 percent of the sales examined were made at LTFV. The margins of dumping were substantial, averaging 22 percent and in some cases exceeding 50 percent. The Commission's investigation disclosed that these margins of dumping were in most instances large enough to account for the entire amount by which the LTFV imports undersold domestically produced birch door skins.

Examination of the injury criteria which must be considered to determine whether the statutory requirement pertaining to injury or likelihood of injury to an industry in the United States is met satisfies us that an affirmative determination is required in this case.

Productive facilities accounting for more than a majority of the aggregate domestic production of birch three-ply door skins during 1970-74 have been idle since October 1974. The closure of the plant of the largest domestic producer occurred during the period in which

LTFV sales were found. The number of production and related workers employed in the manufacture of birch three-ply door skins dropped by more than 70 percent from a range of 300 to 400 in mid-1974 to fewer than 100 in late 1974.

Domestic producers accounting for more than nine-tenths of the aggregate U.S. production of birch three-ply door skins during the period January 1970 to June 1975 reported net operating profits in 1973, but in 1974, these producers suffered a substantial net operating loss.

Sales of birch three-ply door skins by domestic producers fell from \$5.6 million in 1973 and \$2.9 million in the first half of 1974 to \$1.2 million in the second half of 1974 and to less than \$100,000 in the first quarter of 1975.

Evidence of price suppression and price depression suffered by domestic producers is also clear. For example, the selling prices of a large producer show a decrease in excess of 10 percent between the second and fourth quarters of 1974. Domestic producers' selling prices remained at a depressed level during the first quarter of 1975. The reduction in domestic producers' selling prices took place despite increasing unit costs of production occasioned by declining volume and rising material costs.

The present condition of the U.S. industry contrasts strikingly with conditions prior to the penetration of LTFV imports into the

domestic market. As the quantity of LTFV imports and their dumping margins increased during the second half of 1974, there was a corresponding increase in the extent of injury suffered by the domestic industry.

The success of the LTFV imports in displacing sales by U.S. producers, with its attendant injury to the domestic industry, can be seen most clearly by examining changes in the market shares held by United States and Japanese producers. During the period January 1970 through June 1974, domestic producers of birch door skins steadily increased their share of the U.S. market. In the second half of 1974, however, there were substantial changes in the market shares held by United States and Japanese producers. The U.S. producers' market share dropped from 27 percent during the first half of the year to 15 percent during the last quarter, whereas the Japanese share rose from 37 percent to 65 percent.

In summary, the injury that the U.S. industry producing birch three-ply door skins suffered in the form of a reduced share of the market, idling of productive facilities, decline in employment, reduced sales, price depression and price suppression, and declining profit position is directly related to imports of birch three-ply door skins from Japan sold at LTFV. We believe that these conditions will continue in the future if birch three-ply door skins continue to be sold at LTFV.

Therefore, on the basis of the foregoing, we have determined that an industry in the United States is being or is likely to be injured by reason of the importation of birch three-ply door skins from Japan that are being, or are likely to be, sold at less than fair value within the meaning of the Antidumping Act, 1921, as amended.

Statement of Reasons for Affirmative Determination of
Chairman Will E. Leonard

On October 10, 1975, the United States International Trade Commission received advice from the Department of the Treasury (Treasury) that birch three-ply door skins from Japan are being, or are likely to be, sold at less than fair value (LTFV) within the meaning of the Antidumping Act, 1921, as amended. 1/ Accordingly, on October 22, 1975, the Commission instituted investigation No. AA1921-150 under said act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such merchandise into the United States.

Determination

For the reasons set forth below, I determine that an industry in the United States is being injured by reason of the importation of birch three-ply door skins from Japan which Treasury has determined are being, or are likely to be, sold at LTFV.

Birch door skins revisited

Prior to this antidumping investigation, the Commission in 1975 conducted under other statutes two investigations involving birch plywood door skins; such door skins are generally made of three plies of veneer glued together into a sheet with the face ply of birch and are used in making doors. In both previous investigations I reached a negative

1/ Treasury's determination of LTFV sales resulted from its investigation undertaken in response to a petition received on December 12, 1974, on behalf of the Allen Quimby Veneer Co., Bingham, Maine, a division of Columbia Plywood Corp., Portland, Oreg.

determination. However, the statutory criteria of the Antidumping Act (AA) are sufficiently different from those under which the two previous investigations were conducted, the so-called worker adjustment assistance provisions of the Trade Expansion Act of 1962 (TEA) and the "escape clause" provisions of the Trade Act of 1974 (TA), that the instant investigation requires a result different from those reached in Birch Plywood Door Skins and Birch Veneer Panels . . . Investigation No. TEA-W-259 Under Section 301(c)(2) of the Trade Expansion Act of 1962, February 1975, and Birch Plywood Door Skins . . . Investigation No. TA-201-1 Under Section 201 of the Trade Act of 1974, October 1975.

TEA--Section 301(c)(2) of the TEA directed the Commission--

to determine whether, as a result in major part of concessions granted under trade agreements, an article like or directly competitive with an article produced by such workers' firm, or an appropriate subdivision thereof, is being imported into the United States in such increased quantities as to cause, or threaten to cause, unemployment or underemployment of a significant number or proportion of the workers of such firm or subdivision.

My determination in investigation No. TEA-W-259 was in the negative, and I indicated in the report on that investigation that the evidence did not satisfy the statutory requirement that increased imports be a result in major part of trade-agreement concessions.

TA.--The Commission is directed by section 201(a)(1) of the TA--

to determine whether an article is being imported into the United States in such increased quantities as to be a substantial cause of serious injury, or the threat thereof, to the domestic industry producing an article like or directly competitive with the imported article.

My negative determination in investigation No. TA-201-1 was based upon the fact that I was unable to find such increased quantities of imports of the articles concerned.

AA.--In contrast to the worker-adjustment-assistance requirements of the TEA and the escape-clause requirements of the TA just cited, the AA requires for an affirmative determination that the Commission find that "an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such (LTFV) merchandise into the United States" Thus, under the AA there is no need to find "increased quantities" of imports or to tie such increased imports to trade-agreement concessions as was required under the TA and the TEA, respectively, in the previous investigations cited.

Further, the Committee on Finance of the United States Senate in its report on what was to become the TA stated with respect to the Antidumping Act: 1/

Moreover, the law does not contemplate that injury from less-than-fair-value imports be weighed against other factors which may be contributing to injury to an industry. The words "by reason of"

1/ The TA amended the AA in several respects, none of which are relevant to the instant determination.

express a causation link but do not mean that dumped imports must be a (or the) principal cause, a (or the) major cause, or a (or the) substantial cause of injury caused by all factors contributing to overall injury to an industry.

In short, the Committee does not view injury caused by unfair competition, such as dumping, to require as strong a causation link to imports as would be required for determining the existence of injury under fair trade conditions. 1/

In short, to reach an affirmative determination in the instant investigation conducted under the AA, the causal nexus between imports and injury to the domestic industry need not be as strong as under the TEA and the TA. As I have stated previously, 2/ sales at LTFV do not have to be the sole cause, the major cause, or greater than any other single cause of injury. All they must be is a cause of injury to an industry in the United States. The causative link between sales at LTFV and injury must be identifiable, i.e., one must be able to identify the injury as resulting at least in part from the LTFV sales.

Industry

The industry in this investigation most likely to be impacted by imports consists of the U.S. facilities devoted at least in part to the production of birch three-ply door skins. This industry presently consists of some seven establishments, one of which--the Quimby plant of the Columbia Plywood Corp.--ceased production in

1/ S. Rept. No. 93-1298 (93d Cong., 2d sess.), 1974, p. 180.

2/ U.S. Tariff Commission, Elemental Sulfur from Mexico, Determination of Injury in Investigation No. AA1921-92 . . ., 1972, p. 9.

October 1974. Prior to its closure, this establishment--whose productive facilities have been kept intact--accounted for not less than a majority of the aggregate domestic production of birch three-ply door skins.

There are some additional facilities in the United States in which door skins of materials other than birch are manufactured. However, the apparently unique and desirable qualities of birch, coupled with its comparatively high price in relation to the prices of other common door-skin materials, are such as to have enabled birch door skins to achieve a market largely distinct from the markets of other door skins. Further, while the productive facilities used in manufacturing such door skins are suitable with some modification to producing other door skins, in fact such producers as Quimby have made birch door skins their major product.

Imports

The imported articles found to be sold at LTFV by the Department of the Treasury and the imported articles covered by the Commission's notice of investigation in this proceeding are birch three-ply door skins. Treasury's LTFV determination is based upon an examination of more than four-fifths of the Japanese exports of birch three-ply door skins to the United States during the 7-month period August 1974 through February 1975. Treasury found that 82 percent of the sales it examined were made at LTFV. The margins of selling below fair value were substantial, averaging 22 percent and in some cases exceeding

50 percent. Imports of birch three-ply door skins from Japan accounted for about two-thirds of the aggregate apparent U.S. consumption of such door skins during the period examined by the Treasury.

Injury

In the instant investigation there can be little doubt that the statutory criterion pertaining to injury to an industry in the United States has been satisfied. Productive facilities accounting for more than a majority of the total domestic production of birch three-ply door skins during 1970-74 have been idle since October 1974. The number of production and related workers employed in the manufacture of such door skins dropped from a range of 300 to 400 in mid-1974 to less than 100 in late 1974.

Sales of birch three-ply door skins by domestic producers fell from \$5.6 million in 1973 and \$2.9 million in the first half of 1974 to \$1.2 million in the second half of 1974 and to less than \$100,000 in the first quarter of 1975. Domestic producers accounting for more than nine-tenths of the aggregate U.S. production of birch three-ply door skins during the period January 1970-June 1975 reported a net operating profit in 1973, but in 1974 these same producers suffered a substantial net operating loss.

There is also evidence of price depression suffered by domestic producers; for example, the selling prices of the largest current

producer declined more than 10 percent between the second and fourth quarters of 1974 and remained at a depressed level during the first quarter of 1975.

Injury to the domestic industry can also be seen by examining changes in the market shares held by United States and Japanese producers. During the period January 1970 through June 1974, domestic producers of birch three-ply door skins steadily increased their share of the U.S. market. In the second half of 1974, however, there were abrupt and substantial changes in the market shares held by United States and Japanese producers. The U.S. producers' market share dropped from 27 percent during the first half of 1974 to 17 percent in the third quarter and to 15 percent in the last quarter, while the Japanese share rose from 37 percent in the first half of the year to 65 percent in the last quarter.

Causation

All the previously enumerated indicators of injury to the domestic industry appeared during the second half of 1974 and early 1975, which encompasses the period during which Treasury found LTFV sales--August 1974-February 1975. They also emerged concurrently with or soon after a dramatic drop in the price of imported Japanese birch three-ply door skins. The increased penetration of such imports into the U.S. market was largely attributable to their significantly lower prices made possible by substantial dumping margins. The present

precarious condition of the domestic industry contrasts strikingly with conditions prior to the penetration of LTFV imports into the U.S. market. As the quantity of LTFV imports and their margins of sale below fair value increased during the second half of 1974, there was a corresponding increase in the extent of injury suffered by the domestic industry.

Commissioners Moore, Bedell, Parker, and Ablondi asserted (at page 5) in Birch Plywood Door Skins . . . Investigation No. TA-201-1 Under Section 201 of the Trade of 1974, October 1975, that "the most important cause of the injury complained of by domestic producers of birch plywood door skins is the decrease in consumption of door skins resulting from the decline in housing starts." Housing starts do appear to be an important determinant of the demand for birch three-ply door skins. However, this does not preclude an affirmative determination in the instant investigation. As stated earlier, to find the requisite causation, the LTFV imports need only be an identifiable cause of the injury. I find the LTFV imports to be an identifiable cause of injury to the domestic industry in this investigation.

Conclusion

The domestic industry producing birch three-ply door skins is suffering injury in the form of a reduced share of the market, an idling of productive facilities, a decline in employment and sales, a price depression, and a declining profit position "by reason of," as such phrase is used in the AA, the importation of the birch three-ply door skins from Japan sold or likely to be sold at LTFV.

Statement of Reasons for Affirmative Determination
Of Vice Chairman Daniel Minchew

On October 10, 1975, the United States International Trade Commission (Commission) received advice from the Department of the Treasury (Treasury) that birch 3-ply door skins from Japan are being, or are likely to be, sold in the United States at less than fair value within the meaning of the Antidumping Act, 1921, as amended. Accordingly, on October 22, 1975, the Commission instituted Investigation No. AA1921-150 under section 201(a) of said act to determine whether an industry in the United States is being or is likely to be injured, or is prevented from being established, by reason of the importation of such birch plywood door skins into the United States.

In order to find in the affirmative, it is necessary that each of two conditions be met:

- (1) There must be injury, or likelihood of injury to an industry in the United States, or an industry in the United States being prevented from being established;
and
- (2) Such injury or likelihood of injury must be "by reason of" the importation into the United States of the class or kind of foreign merchandise that the Secretary of the Treasury had determined is being, or is likely to be, sold at less than fair value (LTFV) within the meaning of the Antidumping Act, 1921, as amended.

LTFV imports

Treasury's LTFV determination is based upon an examination of some four-fifths of Japanese exports of birch 3-ply door skins to the United States during the 7-month period of August 1974 through February 1975. Treasury determined that 82 percent of the sales it examined were made at LTFV. The margins of LTFV were substantial, averaging 22 percent and in some instances exceeding 50 percent.

Injury or likelihood of injury

U.S. production of birch door skins dropped sharply in the fourth quarter of 1974, when the largest producer, Columbia Plywood Corporation, suspended manufacturing at its birch plywood door skins plant, the Allen Quimby Veneer Company (Quimby), in October of 1974.^{1/} The figures on production by the domestic industry show that in the first half of 1975 only 2.2 million square feet of birch door skins were manufactured, compared with 18.1 million square feet in the corresponding period of 1974.

The number of production and related workers employed in the manufacture of birch 3-ply door skins dropped by more than 70 percent from a range of 300 to 400 in mid-1974 to fewer than 100 in late 1974.

Sales of birch 3-ply door skins by domestic producers fell from \$5.6 million in 1973 and \$2.9 million in the first half of 1974 to \$1.2 million in the second half of 1974 and less than \$100,000 in the first quarter of 1975.

^{1/} The fact that Quimby has suspended manufacturing does not remove it from the industry in this case because of two important facts: first, that Quimby is maintaining its manufacturing facilities at considerable expense, rather than dismantling them or leaving them unattended, and, second, that the efforts to obtain relief were promptly made after suspension.

The Commission has recently held an investigation on the birch door skins industry to determine whether import relief should be granted to the domestic industry.^{2/} While the statutory criteria for finding affirmatively in that type of investigation are different from those in an antidumping investigation, we have looked at basically the same factual information with regard to injury. In the import relief investigation, I, alone, determined affirmatively and stated my views as to the type of remedy I would recommend. Nothing that I have seen in the facts presented in the current antidumping investigation would cause me to change my views on injury. I believe that the domestic birch 3-ply door skins industry has been injured and that the statutory criteria for injury have been met.

Having concluded that actual injury has been established, I do not believe it necessary to discuss the question of likelihood of injury.

Causation

With injury to the domestic industry having been established, it is then necessary to establish that this injury has resulted "by reason of" the importation of the foreign merchandise at LTFV.

It is important to note that during the period of time in which Treasury was investigating the possibility of LTFV sales all of the indications of injury took place. This, in itself, would not necessarily establish the required causal connection but coupled with other indicators, it is an important factor.

^{2/} See U.S. International Trade Commission Birch Plywood Door Skins, Report to the President on Investigation No. TA-201-1 . . . , USITC Publication 743, October 1975.

The success of LTFV imports in displacing sales by domestic producers, with its attendant injury to the domestic industry, can be seen most clearly by examining changes in the market shares held by United States and Japanese producers. During the period of January 1970 through June 1974, domestic birch door skins producers received a small increase in their share of the United States market, but even with this slight upswing, domestic production accounted for only 27 percent of the United States market in 1973. In the second half of 1974, however, there were substantial changes in the market shares held by domestic and Japanese producers. The United States producers' market share dropped from 27 percent during the first half of the year to 15 percent during the last quarter, whereas the Japanese share rose from 37 percent to 65 percent.

The Commission's investigation disclosed that the margins of dumping averaged 22 percent (and in some cases exceeded 50 percent). These margins were large enough in most cases to account for the entire amount by which the LTFV imports undersold domestically produced birch door skins.

It was argued by some members of the Commission in the import relief investigation on birch door skins that the cause of injury to the domestic industry was "the decrease in consumption of door skins resulting from the decline in housing starts."^{3/} I disagreed with this view during that investigation, stating that I believed the "substantial cause" of injury to be increased imports from Japan.

^{3/} See Birch Plywood Door Skins: Report . . . on Investigation No. TA-201-1, "views of Commissioners Moore, Bedell, Parker, and Ablondi" p. 5.

I further stated that I believed the Commission should take the industry as it is, even though it might be cyclical. In attempting to establish causation for purposes of the Antidumping Act, 1921, as amended, I see no reason to alter my position. I still believe the industry must be taken as it is and that the evidence clearly establishes that the injury to the domestic industry occurred "by reason of" the LTFV sales.

Conclusion

On the basis of the previously discussed considerations, I have concluded that the domestic birch plywood door skins industry is being injured by reason of the importation of birch 3-ply door skins from Japan sold at LTFV within the meaning of the Antidumping Act, 1921, as amended.

Statement of Reasons for Negative Determination
of Commissioners Parker and Ablondi

The Antidumping Act, 1921, as amended, requires that the United States International Trade Commission find two conditions satisfied before an affirmative determination can be made. First, there must be injury or likelihood of injury to an industry in the United States, or an industry in the United States must be prevented from being established. Second, such injury or likelihood of injury or prevention of establishment of an industry must be "by reason of" the importation into the United States of the class or kind of foreign merchandise which the Secretary of the Treasury has determined is being, or is likely to be, sold at less than fair value (LTFV).

For the reasons set forth below, we have determined that an industry in the United States is not being and is not likely to be injured, and is not prevented from being established, by reason of the importation of birch three-ply door skins from Japan sold or likely to be sold at LTFV.

The domestic industry of concern in this investigation consists principally of three companies. Of these three firms that market birch door skins, one sells on a very limited "special order" basis and one, the petitioner, by far the largest of the three, ceased production in October 1974. The third admitted in the record that it was not presently suffering injury.

Prior to this antidumping investigation, the Commission conducted two investigations involving birch door skins. ^{1/} In investigation No. TA-201-1, pursuant to section 201 of the Trade Act, a majority of the Commissioners found that "the most important cause of the injury complained of by domestic producers of birch plywood door skins is the decrease in consumption of door skins resulting from the decline in housing starts." The evidence presented in this proceeding again demonstrates this apparent fact. However, the decision in investigation No. TA-201-1 is not controlling in this investigation.

The record in this investigation shows that from July-December 1973 to July-December 1974, while the housing industry was experiencing its most severe recession since World War II, residential housing starts declined by 39 percent. The volume of market lost in 1974, as compared with 1973, by reason of the decline in housing starts as measured by apparent consumption, was 52 million square feet (MMSF). Imports in 1974 fell 39 MMSF below the 1973 level, and the share of the market held by the U.S. industry until October 1974, when the principal domestic producer ceased production, was larger than in 1973. Domestic market share for all of 1974 was the same as in 1973. Imports of birch door skins in 1974, during which LTFV sales were occurring, were lower than imports of such articles in any year since 1962. Imports of wood doors, which are covered by door skins of various kinds, also declined sharply in 1974, by 40 percent.

^{1/} Birch Plywood Door Skins and Birch Veneer Panels, investigation No. TEA-W-259, ITC Publication 719, 1975; and Birch Plywood Door Skins, investigation No. TA-201-1, USITC Publication 743, 1975.

The principal domestic producer of birch door skins was acquired by a "conglomerate" firm in May 1973. At that time, the company lost the services of its principal manager and engineer. During its first year under ownership, sales declined slightly. The decline continued throughout 1974 until the company ceased production in October 1974, 2 months before it filed the petition under the Antidumping Act with the Department of the Treasury.

Profits of domestic producers which accounted for more than nine-tenths of the aggregate U.S. production of birch three-ply door skins during the period 1970-74 have been erratic. Losses were suffered in the early part of the 5-year period; business was profitable during the housing boom of 1973, and declined as the recession hit the housing industry. The pricing policies of the domestic industry do not appear to have been directly related to demand.

In addition to the foregoing, the evidence does not disclose price depression or suppression by LTFV sales. The principal U.S. producer, accounting for a large percentage of domestic production, actually increased its prices twice in 1974. There is likewise no evidence of identifiable sales having been lost to Japanese LTFV imports. Only one alleged claim of a lost sale was made by the U.S. industry (actually made by the principal domestic producer), but investigation by the Commission could not verify this claim.

The major producer of birch door skins remaining after October 1974 has conceded that it is not presently suffering injury by reason of LTFV sales of birch door skins imported from Japan. Statements

by the president of the principal U.S. producer, which ceased production in October 1974, indicated that import protection in the form of quotas or other means would be essential before the plant would return to production regardless of the outcome of this proceeding under the Antidumping Act. 1/

Prices of domestically produced birch door skins increased slightly in 1975, but prices of birch door skins imported from Japan increased substantially, so they were nearly comparable by September 1975.

For the last several years over half of the imports of birch door skins from Japan have entered on the west coast, which is not serviced by the domestic industry. This is one of the fastest growing areas in the United States. In fact, domestic producers have limited their marketing area to exclude the west coast. Neither of the primary domestic producers sold any significant quantity of birch door skins to customers west of the Mississippi River in 1974 or 1975 for this reason. Door manufacturers in this area of the United States must rely totally on imports to meet their birch-door-skin requirements, and sales of birch door skins from Japan in this area could not have caused injury to the domestic industry when the industry itself refrained from selling in this large market.

Conclusion

We conclude, therefore, that an industry in the United States is not being and is not likely to be injured by reason of the importation

1/ Import relief was denied by the Commission (by a 5-to-1 vote) in investigation No. TA-201-1 (Birch Plywood Door Skins) on Oct. 20, 1975.

of birch three-ply door skins from Japan that are being, or are likely to be, sold at LTFV within the meaning of the Antidumping Act, 1921, as amended.

